



Department for
**Social
Development**

www.dsdni.gov.uk

Social Housing **Reform Programme**



TENANT PARTICIPATION STRATEGY CONSULTATION

ORIGINAL CONSULTATION RESPONSES IN FULL

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Foreword

As part of the Social Housing Reform Programme the Department developed 'A Tenant Participation Strategy for Northern Ireland 2015 – 2020'. The draft document was issued for consultation from 15th January 2015 to 8th April 2015.

The consultation document outlined the tenant's role in shaping the services they receive from social landlords. A set of key principles for tenant participation was included as well as desired standards that social landlords should aim to achieve. It also detailed a consumer standard for inclusion in the new Regulatory Framework for Social Housing Providers in Northern Ireland to help govern the strategy.

There was a high level of interest shown, with just over 200 respondents forwarding submissions. The Department appreciates the valuable input to this consultation. Indeed, as part of our ongoing commitment to keep our stakeholders fully informed, we have produced this document presenting all submissions received.

For context to these responses the reader may wish to view this document in conjunction with the:

- strategy document 'A Tenant Participation Strategy for Northern Ireland 2015 – 2020' (the consultation questions in particular); and
- consultation response report which presents key findings and analysis of all responses received

Both documents are available on the DSD web at www.dsdni.gov.uk/shrp-tenant-participation-strategy.htm

The responses have been reproduced in their original form and it should be noted that **these are the views of respondents and not the Department**. There are two sections as follows:

A. Online responses

These detail responses to each question, as provided by respondents via SurveyMonkey.

B. Written responses from organisations

These include original responses, in full, as received by SHRP.

If you have any queries in relation to the document or require a copy in a different format please contact the SHRP Policy Project Team at the address/telephone number below or by e-mail to:

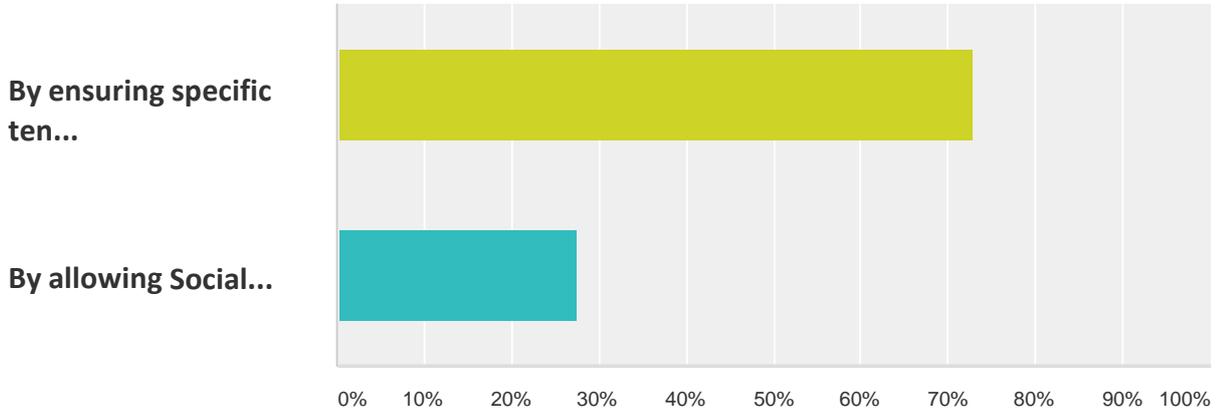
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SHRP Policy Project Team

Q1 How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

Answered: 146
Skipped: 25



Answer Choices	Responses
By ensuring specific tenant participation strategies are developed by Social Landlords	72.60% 106
By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways	27.40% 40
Total	146

#	Please provide your reasons
1	The development of the Tenant Participation Strategy for Northern Ireland by DSD including the regulatory framework will challenge landlords to demonstrate how they are meeting the needs of the tenants in this important area of housing management. A tenant participation framework or vehicle for involvement should be developed by all social landlords in NI but should be flexible enough to grow and change with the needs and desires of the tenants who should be at the heart of its development. Landlords should be free to demonstrate their achievement of the standards in ways which suit their tenants and businesses. This could involve measurement and publication of the impact and outcomes achieved by their approach to Tenant Participation. The development of a Tenant Support Organisation would further demonstrate the Department's commitment to Tenant Participation and would encourage and support Landlords, tenants and others to rise to the challenge of increasing effective participation in a consistent fashion. Within Fold, we have developed a Tenant Engagement Policy and Action Plan which will be reviewed regularly to ensure it continues to meet the needs of our tenants and residents. This review will take place with our tenant and resident representatives and the results will be published.
2	Helm believes it is important for Social Landlords to ensure they have a Tenant Participation Strategy in place, which includes appropriate participation mechanisms that provide tenants with the opportunity to challenge and shape the kind of services they will want and value. Currently in NI, Housing Associations have various methods of involving their tenants and the introduction of a Tenant Participation Strategy will provide a more consistent approach to tenant engagement. The principles of this strategy for NI set a minimum standard that all social landlords should embrace.

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3	Flexibility allows each housing association to suit its own size and tenancies.
4	CIH notes that there is no requirement for social landlords to have a tenant participation strategy; “social landlords may decide to produce a specific tenant participation strategy to meet our expectations. Others may wish to put the relevant information into tenant handbooks or other documents. Either approach is valid” (p.20). We agree with DSD that requirements should be commensurate to the landlord’s function – namely their aims and objectives, customer profile, and/or size. We also acknowledge that some landlords have very effective tenant engagement that doesn’t need intricate or complex structures in order to take place. Nevertheless, we feel there should be a requirement for all social landlords to have a plan for tenant participation development and expansion. Such a plan would support a focus on continuous improvement throughout the organisation that in turn commands stakeholder confidence, while still reflecting the social landlord’s unique circumstances. We also feel this approach would assist DSD in challenging social landlords to increase the extent and effectiveness of tenant participation in Northern Ireland.
5	Apex Housing Association is of the view that Social Landlords should develop a strategy Apex to set out what the organisation wishes, demonstrating how it will comply with regulations, standards and best practice. While a Strategy is important Apex is of the view that any requirement relating to the development of a Strategy should allow for flexibility in regard to participation options, with a focus on outcomes for tenants. It is therefore very important that tenants are at the centre of the development, delivery and measure of outcomes. To enable this DSD should consider the structures, funding and support mechanisms in place in England, Scotland and Wales and seek to develop appropriate support within Northern Ireland.
6	Clanmil welcome the commitment to Tenant Participation. We consider it vital that tenants are supported to have a voice as it plays an important role in ensuring that services are appropriate to tenant needs. The consultation document references best practice in Tenant Participation and outlines some of the positive effects of Tenant Participation. We would welcome the regulation of this activity in a way that is meaningful for tenants. Working with tenants, we see the real and most meaningful benefits for tenants to be positive participation and collaboration in their local community. Local community activities and increased social connectivity are reflective of a more sustainable and well run community – this is what people are interested in. We would caution that there could be a danger that tenants would be ushered into place holding positions if the monitoring of Tenant Participation is focused on positions as opposed to activity. When taking the lead we would encourage government to focus on resourcing initiatives and activities within local communities as opposed to challenging social landlords – challenging could create a rush towards constituting local groups that are not resourced to deliver for local communities. We would recommend incentivising involvement and providing opportunities for engagement through resourcing local activities. It is also important to consider the often sporadic housing stock within Housing Associations. In this respect, in some areas, it would be pertinent to focus on areas as opposed to Housing providers. The key point here is that if a community is well organised and active then this would be reflective of a participative and functional community structure. It is crucial that tenants are involved in steering and choosing the services that are available to them. Tenants need to be supported to understand the implications of Housing Management choices. To challenge housing providers here would necessitate resourcing of initiatives – potentially as pilot schemes.
7	Letting Social landlords work their own way makes it difficult to enforce accountability plus it would create inequality in levels of service one social tenant gets over the other social tenant of another social landlord. A structure must be provided from an advocacy perspective with a freedom within his structure allowing S/L to be creative where needed to engage.

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8	Better to be involved in a strategy.
9	No Comment
10	No Comment
11	Strategy is long overdue and is required to ensure voice of social housing tenants is effectively heard.
12	Because that's what they will do anyway.
13	This is to allow all tenants to get involved in decisions that affect their tenancies.
14	(ticked both boxes) Working together achieves more than working alone.
15	Help us manouvere round obstacles
16	Good mix (both boxes ticked)
17	To give tenants a better say trust and respect
18	RRF believes that social landlords should develop and deliver a strategy for tenant participation. Social landlords should benchmark what they already deliver in terms of tenant participation and seek to improve on it in a way that is realistic and achievable, having due regard for the principles for tenant participation. By having a specific tenant participation strategy social housing providers can then measure their progress against their strategy's objectives and tenants and other stakeholders can determine whether or not landlord's efforts to improve tenant participation have been effective. We agree that tenants and other users need to be made aware of opportunities to participate and encouraged to participate. Some groups of tenants are easier to ignore than others and we welcome the fact that the tenant participation strategy (TPS) recognises that additional effort may be required to secure their participation. RRF supports the establishment of an advocate for tenants to monitor the delivery of the strategy. Part of the advocate's role should be to provide a level of security of those tenants who raise legitimate complaints against their social housing provider and, in effect, act as whistleblowers in instances of poor practice.
19	This would ensure that all social Landlords have near enough the same plans which would be fair for tenants & landlords
20	It is important that we can measure the outcomes and everyone follow these plans
21	Measure plans and everybody follows same plan
22	So everyone is on the same page and it is measurable
23	So every association flow the same plans and measure if they do it.
24	So that everyone is the same and it can be measured
25	No Tick All have to follow same plan which can be measured.
26	So the plan can be measured, and everyone is following the same plan.
27	(Both boxes ticked) Still needs a guide and frame work to justify not to be left to fix something retrospectively and to assist/ ensure equality of provision.
28	Need to adapt to your local community / residents - will be different for smaller housing associations in comparison to the Housing Executive. Housing Associations need more development in order to be expected to produce a 'strategy'
29	Guarantee that their efforts will be recorded and listened to, what was requested and reasons described
30	There needs to be regulation to ensure engagement with the landlord or their representative. There is a bit of work to be done to ensure the partnerships are developed and strengthened. Challenge and the opportunity to do this are essential.
31	Power to influence

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32	Mandatory requirement will ensure social landlords deliver effectively and not just the bare minimum. A strategy is needed not just providing evidence
33	Mandatory requirement will ensure social landlords deliver effectively and not just the bare minimum. A strategy is needed not just providing evidence
34	Effectiveness - commendable ideas but in practice seen to be cosmetic exercises. Tried in Fold but the representative on the committee was inundated with complaints (many not serious) and held to some extent responsible for tenants dissatisfactions
35	There should be a standardised way of measuring the extent of tenant participation. Only then can housing associations demonstrate that they are fulfilling their responsibility to their tenants. A specific tenant participation strategy is the most transparent way of achieving this.
36	It is vital that there is a consistent minimum standard applicable to ALL social landlords - this can then be monitored and regulated. My fear is if allowing social landlord's flexibility will just continue the approach to paying "lip service" to tenant participation - this is simply NOT good enough. HA's need to do this
37	Any new Strategy must be co-ordinated under the umbrella of a set of guidelines common to all. Leaving the concept to individual landlords to implement is unlikely to yield consistent results.
38	Because tenants can see for themselves what is planned and what is planned and what is achieved by landlords
39	The ten part strategy should be - that in order for a landlord to have access to housing association grant or equivalent from DSD - then that landlord must achieve a minimum standard - this could be tiered e.g. to get < £1M p.a. of DSD money - basic level standards < £10M p.a. higher standard < £20M p.a. V high standard Over time the level of participation (empowerment) could be increased
40	The landlords should already have such a strategy to engage with tenants. They need to be held to account, it should not take a large amount of resources to produce a strategy if there is already tenant engagement
41	I feel it has to be a combination of both as no two tenants are the same or react in the same way to questionnaires, tenant participation events, etc. and therefore if a minimum requirement/baseline was set with the option to go further it would be more beneficial and give a truer picture (both boxes ticked)
42	There are varied associations in size and resources available allowing flexibility to produce clear achievements and results will mean a better basic standard is met at least
43	The large variation in size and resources of biggest to smallest H associations will mean each HA will have to develop a community involvement strategy to fit, appropriate to their size
44	Perhaps a "sliding scale" based on the number of properties could be considered? Standard at different levels?
45	As a tenant for Northern Ireland Housing Executive and a member of the strategy panel I am well informed by the NIHE
46	This can then be flexible and suitable to each individual tenant. Can benefit landlord and stay to work alongside each other and tenants
47	Too rigid a structure at the outset will cloud innovation and the establishment of TP within an organisation.

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48	All social housing providers should be legislated in order to provide tenant participation. It is only fair that the same is asked of all. It would also be helpful to have guidelines for housing associations to ensure outcomes are easily measurable and comparable (no boxes ticked)
49	Many landlords may not have a heart to put any real strategy in place. Therefore it's best to set one up. Also it is important that submissions from Landlords is evidence based not just a yearly box ticking exercise that can be bluffed.
50	(both boxes ticked)
51	More active work done than paper work
52	It has been proven that engagement from both parties makes for a more manageable association between the two. In the interests of equality, fairness, accountability, these are all great measures in the building of trust and honest dialogue and participation between the two
53	(both boxes ticked)
54	Won't want it just to be a tick book exercise (both boxes ticked)
55	Would be more public, enabling tenants to come to conclusion at local meeting proactively
56	All social landlords (both NIHE and housing associations) should have uniformity across the board. The strategies should follow the same format for all (not their own interpretation)
57	All social landlords should work in uniformity NIHE have tenant participation strategies housing associations and private landlords should follow suit
58	To bring them in line with the housing executive. So as tenants will be able to have their say in all social housing
59	a big percentage of funds are supplied by DSD a uniform policy of participation should be demanded
60	So that social landlords can become more engaged with local communities
61	There should be a concept to allow for community buy in. Not just talking let's see outcomes that showcase community input. Bottom up approaches should be the underpinning principles
62	Give landlords flexibility to give the tenant the best deal
63	To ensure that tenants have rights
64	How to help people to get more involved regarding decisions made regarding services received in social housing, this strategy is also followed through by NIHE at present and works very well where all types of tenants are represented e.g. single young people, young families, pensioners, disabled and vulnerable adults
65	The landlord must have contact with the tenant regarding rights
66	If all the tenants know there rights the landlord would have to comply
67	Implement legislation on areas such as engagement, accountability, equity etc
68	Proposed strategy needs to be in place before consult but still flexible and open, a lot of independent audit required to ensure efforts not mutually exclusive strategy to engage or try to be in place and frequency and percentage of attempts with property inspection and occupation test i.e. claiming benefit and rent for properties illegally (both boxes ticked)
69	Needs to be basic standards for all social housing
70	There should be a minimum standard set for all social housing tenants. All tenants have a right to have a voice in everyday
71	I think that tenants and landlords need good communication and that both sides are agreed and acted on.
72	Landlords should provide evidence on how they meet the targets

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73	Landlords should provide evidence of how they meet their targets
74	(Ticked both) Because tenants live in social housing and would like to work with the landlord for the good of all.
75	You will have the fiscal evidence to prove the different processes taken.
76	At present many tenants are not aware who their landlords are and never meet them, get information/training/advice or even repairs done by them. More co-operation and involvement is needed
77	By having social landlords have proper plans and proof of doing so. Something should be set out to a standard (both boxes ticked)
78	Making sure landlords have proper plans and seeing changes through (both boxes ticked)
79	In an isolated rural community groups / individual should be able to flexibility some up to involve tenants and not be made to do this.
80	Although smaller organisations have not as much capacity there must be a minimum standard with an evidence base incorporated (both boxes ticked)
81	It is essential that tenants' participation is developed by social landlords as if it is not enforced then there is the fear that tenants and landlords would become detached.
82	Landlords should watch who the houses are rented to
83	Ensure universal minimum standards for tenant participation - Easier to monitor and enforce. Establish clear criteria for evaluation of social landlords
84	By setting up a meeting with the tenants to let them know what's going on
85	It is important to have a common goal that all social housing providers adhere to.
86	Tenants need to be involved - evidence based standards need to be shown and regulated same across the board
87	Worry that there will be different standards for HA and NIHE. Needs to be minimum standards set for all social housing providers - need to be held account and need some scrutiny. (both boxes ticked)
88	There should be a standard policy set up for every panel
89	They need to have strategies in place which can be followed in order to demonstrate what they would achieve.
90	Each social landlord is different and can develop their own strategies according to needs.
91	To allow more flexibility due to different client types, location and varying needs and levels of interest etc.
92	There are many accreditations already looking at tenant participation. There are no 2 schemes the same so ---- will differ in the way participation can work. CHS accreditation looks very much in depth into TP. Associations need to be encouraged to do their accreditations.
93	Social landlords can identify own tenants needs and develop strategy around these needs
94	Need to be both flexible and have a goal to achieve (both boxes ticked)
95	Social landlords should give tenants a choice of activity some tenants like different activities
96	To consider culture and diversity of the tenants and association
97	I do not disagree with a strategic requirement if it allows flexibility. Different client groups and geographical differences will reflect approach
98	Tenants must be given a clear understanding of the strategy. Also find it easy to access information also they must be fully involved in all

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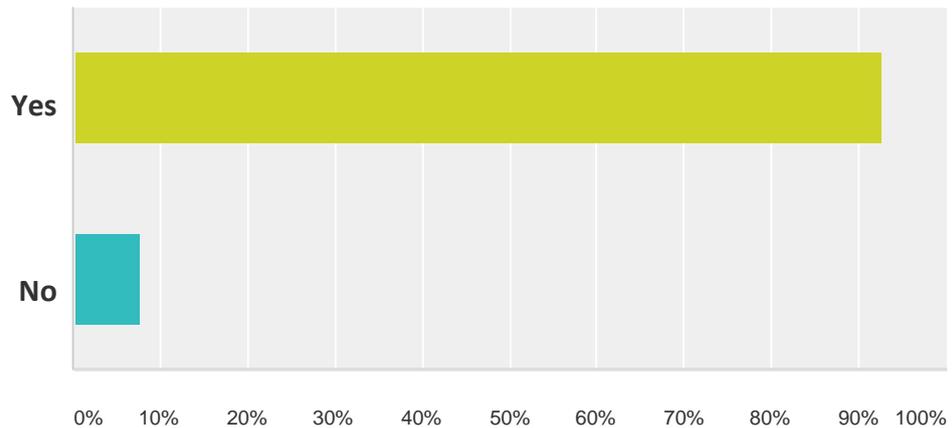
99	Tenants are given a clear understanding. Tenants should find it easy to access information, and participate if they want to
100	Tenants should be involved in the services being offered by a social landlord. To ensure they have a say in how the place where they live is run
101	By providing specific strategies I feel it would make it more fair and if regulated more open for all to name a choice whether to participate or not
102	Must provide an inclusive system so that all tenants can be given opportunities to participate
103	Yes both need to run concurrently. Needs to be standardised approach where assessment can be taken on effectiveness of tenant empowerment whilst reflecting diversity of personal differences (both boxes ticked)
104	Flexibility is key in dealing with individual tenants and groups. Specific strategies can be limiting in certain areas.
105	This will allow a greater variety of examples of good practice
106	If not specified there is too great a chance it will not be offered. However, it is my experience that the majority of tenants are not very interested. (The majority of my tenants are in their 80s.)
107	This will allow a programme of events/meetings to be put in place.
108	As each organisation is different, it is important that they use their own strengths to show how they support tenant participation
109	There needs to be a framework that the HA can use but must allow individual maneuverability of the guidelines to show different HA and ultimately the tenants strengths weaknesses and individuality. (both boxes ticked)
110	Guidelines need to be in place - person centered and taking tenants views and requirements into consideration
111	I believe specific strategies and SL flexibility as above. Compliment platform for tenant participation and involvement. Suit tenant individual needs and expectations. (both boxes ticked)
112	It is important to have guidelines, which are person centered and which should be put together in accordance with tenants views and requirements
113	Providing a strategy allows tenants to know where they stand
114	It is much better to have specific strategies which will involve tenants and make them feel that they have control over circumstances
115	Both boxes ticked
116	Both boxes ticked
117	Not the same rules apply to associations
118	So that the individuality of each organisation/landlord can be maintained
119	Some organisations may do a lot but by ensuring all organisations have a strategy it may help encourage and ensure all organisations are aware of the importance of tenant participation in practice
120	Information Communication. Gives guidance and support to landlords
121	Strategy gives a good guideline on what "Choice" should be doing consulting with their depts. and not just one directorate. It should have a written document of what we in 'Choice' they do. All scheme level SCO's have monthly meetings and actually sessions so this good T involvement needs to be able and measurable

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122	Provide a document for social landlords giving advice and assistance on implementation process
123	Tenants needs, desires and wishes can vary from scheme to scheme and area etc. Tenants should not be forced to participate in things just as a "tick box exercise" so we can say yes we promote TP. There should be more freedom to choose not to participate rather than pressuring to participate
124	To ensure tenants are clearly aware of their role/strategies and they are not placed on a pedestal. This has been the case in Oaklee Trinity and has caused great dissatisfaction amongst staff
125	Each association should be able to work individually with their tenants and decide on the best way of engaging tenant participation that works for them
126	The social landlord will have clear guidelines of what is expected from them and all housing providers will be consistent with what they are doing
127	All HA's will develop tenant participation strategies that way all HA tenants will have the same opportunities to get involved. There are clear guidelines for the housing professionals to use
128	Too much information dangerous, too little not sufficient - getting @ balance very important particularly for data protection and client confidentiality should be @ written document.
129	By allowing social LL to be flexible through interaction with tenants, social LL can understand tenants wants/needs and what they want to be involved in. Through this
130	If current approaches work and meet expectations social landlords should continue to use them. With continually reviewing their approaches to continually improve strategies
131	Housing associations are not generic and each must develop participation strategies designed for their client groups
132	Structure would be more specific
133	Easier to measure
134	Expectations should be across board - 2 strategies developed that demonstrate achievements for all social landlords
135	Social landlords need to have firm plans put in place to involve tenants. This way tenants know what they can do or who they can go to if they have a query.
136	All Tenants have a right to be involved in the decision making process, others may not be as vocal but it is important to have a voice around the table from someone who is a social housing tenant
137	Would need close monitoring to ensure Social landlords make this happen
138	If you consider tenants as stakeholders, you have to have stakeholder participation to make any organisation work effectively. Tenant forums and committees etc
139	It is paramount if society is to be included in social housing planning processes a bottom up approach needs to be implemented. Communities understand the needs and therefore, should have a positive input in all aspects of social and private landlord processes.

Q2 Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

Answered: 160
Skipped: 11



Answer Choices	Responses
Yes	92.50% 148
No	7.50% 12
Total	160

#	Please explain
1	The Ten Principles for Tenant Participation are a solid foundation for any organisation committed to tenant involvement. They set the standard for effective tenant participation to be embedded in the culture of the organisation, as it should be. Within Fold, we have incorporated these principles into our Tenant Engagement Policy and Action Plan.
2	We believe that the expectations are appropriate and fair. At Helm Housing we are currently revising our Tenant Engagement Strategy and have found the timing of the Department’s consultation on the Tenant Participation Strategy for NI to be extremely advantageous. The principal objective of reviewing our current strategy is to assist Helm Housing to achieve the highest possible standards for tenant participation. We believe the ten principles for tenant participation, as set out in the consultation document, are crucial to the implementation of meaningful tenant involvement. The success of any Tenant Engagement Strategy will rely on a culture of mutual trust, respect and partnership between tenants, Board members and staff at all levels.
3	Yes, and CIH acknowledges and encourages the proposed link in with the regulatory framework. We agree with DSD that requirements be commensurate to the landlord’s function – namely their aims and objectives, customer profile, and/or size.

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4	Apex supports the development of common principles to underpin the development of standards across social landlords. Given that social landlords vary in size and some groups housed have specific and complex needs, the principles and standards need to ensure a level of flexibility in regard to the needs and wishes of various groups. Further guidance in regard to a number of the principles outlined in the strategy would be useful for landlords, e.g. Principle 5 – The creation of structures to ensure that both tenants and social landlords understand what is expected at the outset and on an ongoing basis would be of benefit. Sharing of information in a user friendly way, etc. would assist. The development of guidance, training and support in regard to this would be beneficial. Principle 6 – Further clarification and guidance on this principle will be necessary. While resident and tenant groups should operate independently a clear code of conduct and guidelines regarding their roles and relationships is necessary. Awareness of how individual and group actions will impact on the community they represent as well as their social landlord is essential. If tenants are to become members of social landlord forums or the Board of Management, the requirements of the group will need to balance with the business needs of the organisation. Principle 8 – Tenant organisations also required resources including training and support. Appropriate support and funding will be necessary for both tenant organisations and social landlords. Principle 9 – Consideration needs to be given as to how social landlords engage with rural communities and further guidance on how this can be done. In order to take forward working with dispersed rural community the Department could consider joint working between social landlords.
5	The 10 Golden Rules are very positive and absolutely preferable to the overregulation of activity that must be flexible and responsive to tenant needs. There does need to be some clarity around the out working's of some of these principles as there will be significant variation in how things are interpreted by Housing providers. It may be that some organisations believe that they are adhering to the principles whilst, in reality, they could be doing much more to include, engage and mobilise tenants. The area of Tenant Activity outlined does not reference localised participation. Clanmil know that localised groups are the bedrock of organisational participation. There must therefore be a more significant consideration of how housing providers support the development of local groups. Clanmil already has a Tenant Participation Strategy and Plan which is due to be reviewed later in 2015 and we welcome the recommendations in this area. The ethos of using the DSD strategy as a motivator is welcome. The resourcing of pilot engagement programmes and sharing of best practice would be important to increase tenant participation across Social Housing providers.
6	Having the 10 rules offer some accountability also S/L should look to provide independent neutral person to discuss through changes so tenants have a clear perspective on how changes impact Logistically. S/L should look to engage local community groups at the earliest possible stage as certain matters may have an impact on the wider community.
7	No Comment
8	No Comment
9	No Comment
10	The golden rules show a commitment to tenant participation and offer some protection to tenants.
11	All Tenants can have as say as to how things get done.
12	But Tenants must have enough time to consider issues.
13	Tenant Participation is required at all levels across the board for mutual trust and respect
14	Very good, better insight to see them
15	Everyone has accountability

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16	RRF is of the view that the strategic approach to tenant participation suggested is fair and appropriate. We accept that different models of tenant participation will develop to meet the needs of both tenants and housing associations who are a diverse range of organisations. We believe that social landlords should be expected to adhere to the principles for tenant participation set out in the strategy. Social landlords should also ensure that different tenants will want to participate at different levels and ensure that a range of participation opportunities exist. We welcome the recognition of the need to support tenant participation, through training, resources and staff time to support to build the capacity of tenants to get involved. It may be more efficient for smaller housing associations to share tenant support functions or to contract in independent organisations to deliver these functions for them. We agree that social landlords should be expected to regularly consider what more they can do to promote and improve tenant participation and that they should fundamentally review their local tenant participation strategies or methods at least every three years. RRF strongly welcomes Principle 9 in the principles for tenant participation that tenant participation in rural areas must suit the particular circumstances and needs of rural tenants. The outworking of this principle should recognise that tenant participation in rural communities may cost more to resource due to the smaller numbers of tenants spread across a larger number of small social housing developments. There may be merit in housing associations considering how they can work together across the new super council areas to meet the tenant participation needs of rural social housing tenants.
17	They cover accountability, fairness and openness. It is also important that all tenants are able to voice their concerns and can feel that they can have a say and participate in decision that can affect them. No one is left out and they can choose what level of involvement they want to participate at.
18	No comment
19	No Comment
20	Very Fair
21	No Comment
22	yes they are fair
23	They are fair.
24	No Comment
25	But try to also include (not exclude others in some areas/ estates E.G NIHE look estate wise in provision of services (grass cutting etc) and community support, anti social behaviour help etc. E.g. some estates are mixed tenure owned / rented NIHE, Rented private etc.
26	Landlords vary across the board and I think it is important that DSD set out fair and reasonable standards - some landlords are better than others.
27	Open to fast evolution & improvement. Need effort to ensure understand & remember, not just ram it down their throat. Try to reassure & have mechanism of support. Very important not to go back on word. For most mentally related people's problems try to support & feature the same or better than other areas especially within same association.
28	So long as there is independent challenge.
29	Must be seen to work
30	Very comprehensive. Model should be replicated for private rental
31	Very comprehensive. Model should be replicated for private rental
32	Landlords may not realise the importance of planning an approach to tenants otherwise

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33	Every tenant should have an opportunity to be involved in decisions which impact on their housing and their community. These principles seem appropriate. *feedback - Housing associations should be expected to report back to tenants to demonstrate how they have taken their views and concerns into account.
34	10 golden rules = common sense
35	Good communication at all levels is essential, as laid out below. This has to be reciprocal, requiring tenant feedback and further participation.
36	It lets both landlords and tenants see what is expected from each other
37	Principle 1 unattainable (boards only meet once a month) P2, 3, 5 difficult to get tenants to give the time, knowledge required. P7 is far too wide a get out (set minimum standard social landlords must achieve in order to receive DSD £) P9 why just rural - gays, travelers, disabled, etc. P10 what does it mean in practice?
38	Needs to be continuous, flexible and accountable through appropriate legislation
39	I feel both landlords and tenants should take responsibility for the way they live and having a set of guidelines such as these principles will enable greater participation, openness
40	Principles take into account the needs of both associations with clear strategy and needs and expectations of tenants involved
41	Covers the key principles to ensure effective and inclusive tenant participation
42	Meetings are held on a regular basis
43	Yes but I would have concerns about expense ref travel, office time, paperwork etc and feel DSD should fund assist.
44	No boxes ticked
45	I think it's a fair and balanced.
46	Decent tenants need to have freedom to speak out and have their say without feeling intimidated. What might not annoy one person another might annoy another and why do Housing Executive send alcoholic people and drug dealers into housing associations and say they're homeless put them into buildings that's suitable for them
47	Have to be a two way street
48	I think these 10 principles are a good template for a working structure that can always be added to, changed or amended, so therefore a good starting block
49	Think this is very fair and well thought out
50	Maybe some tweaking needed to some but it's a start point
51	All social landlords need to have the same strategic approach across the board, however how will DSD deal with housing associations who don't buy into this strategic approach
52	They encourage joint working which is flexible and transparent. Use existing structures/relationships
53	As long as it is followed by social landlords
54	Housing executive/tenant strategy is excellent unfortunately this does not exist with most associations
55	I Think that tenants should have participation on the board of their local housing
56	As associations I feel that there is a lack of balance as far as local residents are concerned i.e. interface communities are vulnerable
57	I think that social landlords should engage in every way with tenants to form a good partnership that suits both

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58	In relation to NIHE
59	Landlords have the understanding that residents association and tenant groups are independent organisation. That these organisations need training and support and all need their say. This is already a practice of the NIHE. All social landlords must follow the law
60	Most tenants don't even see the landlords let alone talk to them
61	Most of the landlords I have had dealings with do not take these tenants as having any rights that they are doing them a favour
62	The 10 rules encourage participation and collective working. Like previous strategies the problem is usually down to legislation (this has been used too often to hinder progress). Barriers need to be seen as opportunities for positive change
63	Stress official help and provision of 3rd party insurance/liability cover by landlords
64	What happens when there is no local tenant's organisation - or residents group? Individual tenants must be engaged somehow
65	For too long tenants had no voice but now groups have been set up to give a voice to all tenants and landlords must listen
66	We need these rules, we would like to see more people from housing on the ground spending time in communities especially rural areas where access for locals isn't always available
67	Have to open and accountable with one another. Respect and Trust and work with one another
68	It covers all corners of the tenant participation
69	Following on from comments made during session. Concentration of services in rural communities is important. Rural Communities need supported by Housing Executive Staff as too much emphasis can be relied on upon needs.
70	both, care must be taken surrounding contracts/landlords could produce that could waive the right to participation (both boxes ticked)
71	Without these principles there would be poor structure for both tenants and landlords.
72	It's not just the groups it is important the people who live in the area know what's happening
73	As long as all social housing providers obey the same rules.
74	I believe resident should be able to have a voice - in a small area some tenants may not have the voice or skills to attend. Any number of a community groups can represent them.
75	Housing Executive seen to be doing a full time job. More Tenants should get involved with local communities.
76	Yes as the NIHE are already undertaking these rules - this should be done by all social landlords - concerned that private sector has no voice and some are within estates
77	By having a strategic approach you demonstrate transparency and level of standards expected.
78	but how do you speak to tenants as most tenants are not interested until it involves them
79	Same reasons as above - too restrictive and not all tenants are interested in involvement - can't force them.
80	As long as flexibility is adhered to
81	Allow the tenant the opportunity for involvement, how it is structured, what's enforcing it
82	All companies look towards their customers for input and ways to change the service for the better. This can always be improved by housing association
83	Tenant participation is different for each tenant

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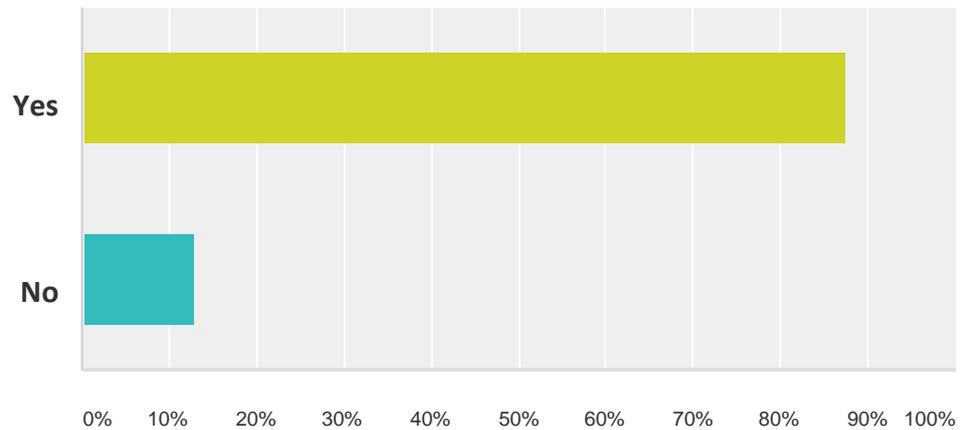
84	Taking into consideration of area and needs of tenants allowing individuality and purpose
85	I think this is an important area that requires time and resources by the landlord dedicated to it, when possible
86	As long as tenants are kept up to date with all strategies and activities
87	As long as tenants are kept up to date with all strategies and activities
88	People that choose to live in sheltered accommodation should be made aware of the different opportunities that tenants have to be involved with the running of their scheme
89	Don't know need to learn more
90	Although need to be sensitive to needs of tenants
91	Tenants have the right to choose whether or not to be involved. Independent choice is essential and tenants should have an opportunity to have their voices heard in all areas that affect their housing and everyday lives.
92	because it is very inclusive
93	All tenants do not have access to web page. Copies should be automatically sent to tenants.
94	Tenants must be allowed to choose at what level they choose to engage in. There is a need to keep things "local" Fermanagh tenants (rural) need Fermanagh solutions. North Belfast tenants need a different approach so again any strategic approach needs feasibility. (both boxes ticked)
95	No.9 Tenants in rural areas have different needs than urban - this has to be considered with different rules applied
96	Tenants should have input into decision being made on their behalf or which is going to affect
97	Providing the minimum standards and guidelines i.e. a measure to gauge achievement and opportunities
98	Yes as tenants have a right to be involved in all decision making
99	All information within the association is explained to all tenants i.e. policies and rules and that excludes the tenant forum
100	As long as expectations are fair and include all groups
101	As long as expectations are fair and include all groups
102	This creates problems when tenants become involved
103	sometimes this can create more problems for the landlord
104	Would need more info regarding this
105	To allow tenants the choice to participate
106	The 10 principles guide to the company and ensure the hard to reach groups are heard as we have general needs tenants so evening meetings required
107	Guidelines provided through the '10 Principles'
108	As long as the housing association adheres to the strategies/guidelines. In many cases tenants have been given too much power overriding decisions and procedure practices
109	Tenant participation is important and therefore essential to promote an effective organisation - however, tenants need to be monitored more closely as some can react differently to involvement and feel that they have more power than other tenants
110	Engagement as a group and individually, tenant involvement. Speak directly to tenants. Section 75 - ensuring equality
111	Tenants are aware of participation at beginning of tenancy and can decide if they want to be involved

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112	If expectations are met then tenants and other users will be aware of participation opportunities and numbers participating will increase. Result in greater understanding and workability between LL and tenants
113	If all expectations are met, I feel this would greatly benefit tenant participation within social housing
114	The approach is based on choice and opportunity, which can only be regarded as reasonable and fair
115	Because we get feedback from the meetings. Even if a tenant from my scheme does not attend
116	Tenants have a choice of engaging or not right from sign up stage and continually
117	Social landlords involve their tenants to participate in all areas which affect their tenancies - currently through consultation - 2 tenant forums
118	It does not discriminate against anyone and anyone can be a part of it if they wish and have their voice heard
119	Sometimes tenants with disabilities and learning difficulties are not promoted in the involvement of the tenant participation process.
120	Seems the current process lacks synergy and therefore, does not allow communities to have a balanced input in decision making.

Q3 Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Answered: 166
Skipped: 5



Answer Choices	Responses
Yes	87.35% 145
No	12.65% 21
Total	166

#	Please provide your reasons
1	The development of an independent tenant support organisation would demonstrate the Department's commitment to tenant participation in Northern Ireland and help to bring about the consistency of opportunity to engage which this research has noted a lack of in some organisations. An independent organisation could develop training and support for tenant organisations and enable increased opportunity for joint working between different landlord, tenant and community groups. This would improve the quality and value of tenant participation across Northern Ireland and also promote better use of resources within landlord services. With increased awareness and involvement by social landlords in a more coordinated and consistent approach, it could build capacity and confidence in this area and ultimately, work towards the goal of tenant empowerment where that is achievable and desirable.

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2	<p>Helm believes that the Department should support an independent tenant-focused organisation. We recognise that Supporting Communities NI (SCNI) has been promoting best practice in community participation for many years. They promote best practice in Community Participation in Northern Ireland through a 'grassroots' approach to Community Development, providing tailored support, advice, information and training to new and existing Community Groups, Statutory and Voluntary Organisations. SCNI has primarily supported the Northern Ireland Housing Executive and their tenants over the years but many Housing Associations are now enlisting their services. For example, during 2013 Helm requested their assistance in training staff on maximising tenant involvement and we subsequently introduced the role of Tenant Champion. This new role was created to increase the level of tenant engagement specifically where tenants were not represented by local community groups/associations and to ensure tenants had a voice and could provide feedback particularly in the development of housing and related services. In 2014 our Association launched a review of our Tenant Engagement Strategy and again we acquired the services of SCNI. Together we are consulting with key stakeholders and carrying out a review of our current methods of involving tenants in order to maximise and create more meaningful participation. We believe that SCNI has developed the expertise to support/develop and train housing professionals and tenants.</p>
3	<p>Tenant's organisations should be independent of housing associations but tenants are likely to need support. Independent support would be useful.</p>
4	<p>Yes. CIH's education and training function supports tenant involvement and resident scrutiny, and we also acknowledge the work of Supporting Communities NI. We support any increase in variety of and improvement to local structures and methodology that provide support, advice and guidance to tenants and tenant groups; and that act as a conduit for and enhancer of tenants' voices and concerns as individuals and as groups. Independent tenant support can help tenants work well, raise the quality of their work, and share experiences and expectations with others in their tenant participation activities.</p>
5	<p>Apex agrees that there is a need to develop independent tenant support in NI. Apex is of the view that the current arrangement between the Housing Executive and SCNI should be considered, as well as those mechanisms operating in the rest of the UK. An independent tenant support body should be available to all social landlords and tenants. There is a need to support tenants, provide training and assist with sourcing funding opportunities for communities. There is also a need for the independent tenant support organisation to offer a service to social landlords in regard to best practices and information. This organisation could also assist social landlords in developing and delivering training for staff. The support offered should be flexible. Consideration needs to be given to the develop of such support; is it possible for one organisation to meet the needs of all social landlords; given the complex needs of some tenants, the training and support available must be flexible. The draft strategy document has referred to the need for funding and to be supported by government to work. Apex would agree with this view.</p>
6	<p>Yes, if this is fully resourced and Housing Providers are able to avail of these services a service would be welcome. • This organisation would need to work on a local level – developing Tenant Associations, making them aware of their role, function and the opportunities that they can avail of. The key thing in this process needs to be that the organisation develops participation on the basis of the needs and interests of tenants. It must be activity led and work with tenants to encourage active participation in their community and in steering the work of the Housing provider. • On an organisational level the organisation should work with Tenant Fora to develop scrutiny panels, • The organisation should facilitate the sharing of Best Practice for Tenant Participation • The organisation would need to bring a fresh approach to Tenant Participation and be equipped to work with local communities on a regional basis.</p>

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7	This would allow for better holistic decision to be made regarding both parties. It also helps tenants feel supported and less vulnerable it's understandable for tenants to have a lack of in-depth housing knowledge and starting to learn everything when a problem does arrive leaves them in a vulnerable starting position to make a stand.
8	No Comment
9	No Comment
10	SCNI provide and work great with the NIHE
11	Yes definitely - SCNI already doing this extremely well and should continue.
12	I think it might be a good Idea, Then More People would have a say.
13	Special Housing Tenants need to come under a tenant support organisation E.G Supporting Communities Northern Ireland is a good example.
14	As we work with SCNI we would find it difficult not to have this support.
15	Happy with apex doing it, finds it easier and understanding
16	It would give tenants support etc.
17	DSD should support the development of an independent tenant support organisation. This should support tenants across all social landlord types, provide support independent of social landlords and provide support for tenants to engage in objective and independent scrutiny. Supporting Communities NI has already been undertaking this independent tenant support role with NIHE tenants and has supported some housing associations to develop their tenant participation structures.
18	I don't think so, SCNI have been doing fantastic work for tenants for years. They help with training advice, support and jargon busting for fledging tenant associations/ groups.
19	We need to have Supporting Communities NI.
20	Supporting Communities NI
21	I believe this should be SCNI. They are an amazing support to our community group.
22	SCNI We need to be supporting communities.
23	SCNI
24	SCNI. Responsible and open , Accountable
25	To protect tenants form corruption
26	E.g. SCNI. Helps consistency of quality and type of support and helps make a good support model without having to complicatedly specify service provision (possibly evolve this over time).
27	SCNI is 'ready - made' to work as an independent body. My only concern is that there is a need for proper funding to be put in place to oversee this.
28	Volunteer to do minutes, books etc. Take untrained official decisions put volunteers off. SCNI good example of support model. Try to ensure consistency of training & direction. Floating audit/shared experience/visit other groups for continuous improvement.
29	Yes, but there needs to be a clear track record and future strategy demonstrated and an agreement / commitment to partnership.
30	Fairness and honesty and must be seen to work, but in N Ireland many residents have strong paramilitary connections

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31	SCNI in existence. Does it fill this role already? Do evaluations demonstrate this? Yes - support independent orgs and hold accountable - independent representation - more transparent - where would the funding come from? What service would be impacted on if resources were diverted to fund this? Consider voluntary independent body???
32	SCNI in existence. Does it fill this role already? Do evaluations demonstrate this? Yes - support independent orgs and hold accountable - independent representation - more transparent - where would the funding come from? What service would be impacted on if resources were diverted to fund this? Consider voluntary independent body???
33	Any strategy requires leadership as well as followers
34	Yes tenants will need the support of an independent organisation if for any reason they are not satisfied with their landlord. An independent organisation could provide advice and support from an impartial perspective
35	It is important there is an Independent organisation to assist/provide service to all social tenants in era of fairness and equality. All social tenants must be afforded equal opportunities in terms of engagement, training, advice etc.
36	Very important that there is a cohesive tenants voice at the level of an individual scheme at landlord level and at NI. Level. Very desirable but will be difficult to achieve even in the long term.
37	The question (the last 8 words) implies 1 NI tenant organisation, it doesn't exist and hasn't developed in the last 4 decades currently my alternative is that the 11 super councils are required to provide support for the tenants groups within their local area
38	A type of tenant ombudsman would be required who can hold landlords accountable
39	Unless there is financial support the organisations will not survive, funding will enable education on various issues and lead to greater understanding of how the whole system works and the pressures on it
40	Depending on who the organisation answer to? Executive or associations. What guidelines are produced? Is there consultation from associations
41	Tenant support orgs would assist both tenants and landlords in ensuring TP is being undertaken correctly, and most effectively as in a lot of cases the expertise isn't available or existing within existing resources
42	In principle the development makes sense but realistically will it be achievable? Difficult to make a definitive decision at this time
43	It is a safeguard for tenants
44	This can further independent support for tenants, separate to housing, housing support. Honest opinions open to negotiations
45	I feel it is enough certainly at this stage that an organisation must demonstrate to DSD their commitment to TP.
46	Having an independent support organisation provided effective assistance to community groups/tenants. The independent body can be viewed as being completely objective and is in a perfect situation to hold social housing providers to account.
47	In order to be open and fair
48	To make it a level playing field
49	Splendid idea funding may be a bit of a problem, but if that problem can be overcome, carry on

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50	Support and guidance is always helpful
51	Would encourage tenants who get involved by assuring them that by recognition they are important to landlords and opinions are valued when asked of them
52	The existing index tenant support organisation needs to be supported and resourced by the department to allow the continued platform for tenant participation for all (NIHE and housing associations) Support best practice support services/projects in the communities where tenants live and make use of
53	Provides support to local community/groups assists with structures/training etc
54	So as the department can provide help and training through organisations like SCNI
55	A forum is required that all social housing providers are willing to engage in
56	Yes I think the department should help tenants by training tenants on housing in Northern Ireland
57	It's important that all involved in the process again striking the balance. Training for tenants on issues of equality. Openness and transparency is required at all times SCI don't meet the demands , however
58	Yes we need everyone in the room to give tenants the best service for all the community
59	SCNI is the present experienced organisation in this field
60	An independent organisation such as SCNI who work widely with NIHE should be in place to help all tenants participating groups get organised and training and bring social landlords to account
61	We need someone who is independent
62	People need to have a say
63	The importance of an independent organisation is the ability to challenge whilst having a strong voice. Equity needs to be to the core of any partnership
64	Good example and collection of similar good practices and body's willing to share knowledge
65	This would draw individual tenants from all social providers and perhaps encourage tenant/resident groups in areas where there are more
66	Yes SCNI are already giving great support to groups and this should be carried on in fact more money should be put in to increase the support for more independent tenant support
67	Yes I think this would be a great idea especially for a lot of these communities have an older population and not all of these people have access to all information, it's the voluntary section that provides this information through these meetings. I would like to see SCNI to be that organisation
68	Tenants should be allowed their own individual voice
69	Tenants should have their own individual voice regarding any issues they have
70	It would be a good idea to have a separate organisation to work with tenants such as SCNI
71	It gives the tenant more of a say and makes them feel like they are valued
72	Corruption and bias exists in many government departments as is and their operations should be monitored more closely by at least one independent organisation
73	encourages communities to come together
74	Yes - Organisations such as supporting communities should be helped to support communities and get necessary findings for this.
75	encouragement of community participation

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76	Tenant organisations need both financial support and training in order to empower communities.
77	To ensure no conflicts of interest between support for rights of social landlords and rights of tenants.
78	To make sure all the groups tenants are not missing anything. To make sure we are right. One separate organisation just to go over everything is right
79	Provided "all social providers" have the same objectives
80	Need to be supported to ensure that information is available to all. Ensure guidelines are being adhered to.
81	Should HA look for their own support workers. Define support - needs to be funded. How does landlords support and train their staff - co-ordinated/joint up approach might be required. SCNI do a great job to support communities and ones involved in advisory panels with NIHE tenants and HA tenants
82	Department Should support a percentage towards the independent tenant organisation
83	This organisation can advocate for all tenants whether in social housing or general housing
84	Each HA has its own ways of doing things. An Independent organisation would need power which would involve a new overall organisation.
85	Better to have independent experts and help to alleviate pressure from housing associations
86	There needs to be an overall body for support between organisations - looking at how schemes differ and what works best at particular schemes.
87	Would allow an impartial perspective for tenant involvement and ensure strategy is run fairly. Structure could be dependent on group/tenant needs
88	Good practice will allow all residents to share ideas and better practice
89	most important
90	To hear the tenants voice
91	Consistent approach - cost effective/economy's of scale. Useful support if difficulties. Useful to input resources for information/good practice - new ideas
92	Tenants must be well supported with funding and information
93	DSD will support tenants with information and funding
94	I think that forming a tenant support group can only be a good and positive thing as tenants know what it's like to live on a scheme and what things would benefit themselves, other tenants and the housing association
95	All tenants should have a voice and a choice at giving their opinions or not and looking for help when needed and knowing there will be a support organisation would be very beneficial
96	Needs to separate and independent from HA as they ensure empowerment is actualised
97	Essential for tenants to know that there is an independent support mechanism available. A means to have their views and opinions listened to and acted upon and to be supported and advised on issues important to them.
98	DSD is well placed to do this and is aware of the advantages - and the challenges
99	It is important that tenants are empowered to be able to comment/change their circumstances. There is too much emphasis already about stuff that is available online - very few of my tenants have any experience of computers or the internet.

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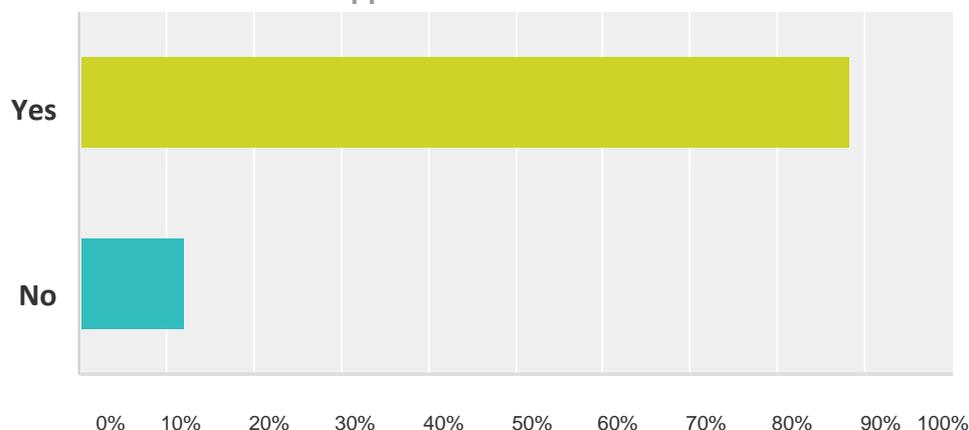
100	Tenants should have more say in decisions made on their behalf.
101	I don't believe that there is a need for this; it would be a "talking shop" for those few people who want "the stage" and to moan about their landlord. Another layer of bureaucracy which will eat up tax payers money
102	How independent? is it tenants only or have others involved with them
103	could enable tenants the opportunity to work together
104	It enables tenants to remain in own homes for longer with support mechanism in place
105	It gives all groups the opportunity to work together to supply a support system which is beneficial to tenants
106	Providing support to tenants means a great deal
107	Yes because it gives tenants complete freedom of opinion
108	As feel waste of money most tenants not interested
109	Have had problems with tenants becoming involved
110	These again can create a lot of problems. A lot of the tenants I've met over 10 years are just happy that someone else is making decisions for them
111	Better support
112	SCNI are a good resource @ present and maybe they could continue the role. If DSD roll out will there be funding?
113	I feel we already have sufficient tenant participation support within my organisation - we have a tenant on a tenant forum group and a regional group who meet very regularly and bring concerns to members of staff and raise issues. Also regular tenant meetings on sheltered schemes. So quite a lot of some tenants go onto tenant forums for their own gains and are not representative of a collective group of tenants which is unfair
114	No. However, if it is introduced, again clear roles/responsibilities/strategies need to be communicated to tenants. We have experienced major issues with tenants exercising too power over housing issues and decisions
115	I feel that an individual TP group in each housing organisation is enough
116	I think tenants may have more co-operation with an external body. also it amalgamated tenants form all social landlords
117	All tenants from the different housing associations could come together and share good practice
118	Those involved need to be professional and protect client confidentiality. Both urban and rural areas need to be incorporated. Needs to be very well managed
119	DSD wants to encourage tenant participation and should therefore support it
120	With an independent tenant support organisation, tenants will be able to put across their views/concerns and opinions. These concerns will be greater publicised and easier to solve/help make lives better
121	More focus on the goals needed to make TP work successfully
122	Choice's recent engagement with SCNI has shown that expertise can be developed through an organisation dedicated to TP
123	All needs appear to be adhered to
124	I think that is up to each housing landlord to support this

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125	Set up with charitable status, therefore no or less financial impact on Dept. If associations didn't get funding would they still support this?
126	Believe social landlords currently spend a lot of money ensuring their tenants are consulted on aspects which involve where they live and their homes through leaflets/reports/meetings/forums
127	Tenants have voices that need to be heard. Although there does need to be a structure in place so tenants know who can get problems sorted rather than the '2 many chiefs not enough Indians approach' the tenants may take if left to their own.
128	Supporting Communities NI has been part of the Tenant support system for very many years, although that would be more directed towards social housing areas with NIHE properties. It is important that all Tenants of Social Housing providers are encouraged to participate and build on their skills and knowledge of housing issues and learn of other organisations which may be beneficial/helpful to them
129	Provides platform for tenants to raise concerns but would need cross section of tenants to allow for representation across all s75 groups - how do you 'Police' the effectiveness of this organisation and its independence?
130	Yes. As tenants, whether in NIHE/housing association property. Particularly long term tenants, I feel that we should be listened to more and our views considered on local planning issues
131	Providing it is balanced and outcomes are part of a bottom up and top down approach.

Q4 Is the regulatory standard clear and understandable?

Answered: 160
Skipped: 11



Answer Choices	Responses
Yes	88.13%
No	11.88%
Total	160

#	If not, what more would you include?
1	The standards should be amended to include "All social landlords" and not just "Associations" as it currently reads.
2	We believe the regulatory standards, set down in the consultation document, are clear and understandable. At Helm we are committed to putting tenants first and aim to provide a level of service that not only meets expectations but enhances the lives of our customers by making a positive difference.
3	It would be clearer to put "tenant participation" in plainer English.
4	Yes, and CIH acknowledges and encourages the proposed link in with the regulatory framework. The regulator should require information about; monitor; and be able to intervene fully under this tenant/customer role and not just an economic role – evidence of poor resident empowerment and opportunities for involvement should be a trigger for regulatory intervention to support residents and so that its importance is underlined. This regulatory standard should ensure the provision of high quality services to tenants and service users through regulatory mechanisms. We also feel that an effective regulatory framework should give residents access to information and enable them to do something with it. The regulator should a) ensure that social landlords have a basket of resident-focused performance indicators and b) provide comparative performance data. Social landlords should enable residents to act on this data, drawing on independent information and tenant support.
5	It is the view of Apex that the Regulatory Standard set out at Page 24 requires greater clarity, particularly in regard to the any potential difference in a social landlord's responsibilities to its tenants in the first instance and then to other customers. Apex welcomes the additional information set out below the Regulatory Standard and at Appendix B. Further information in regard to how this will feed back into or expand the three points contained within the Regulatory Standard would be useful. Further development of the link between the Regulatory Standard and the specific standards and outcome measures set out at Appendix B may provide greater clarity in regard to what is required.

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6	No Comment
7	No Comment
8	No Comment
9	No Comment
10	No Comment
11	No Comment
12	Copies must be made available to tenants as and when required.
13	No Comment
14	Easily understood
15	Both landlords and tenants the right choice
16	Whilst the regulatory standard is clear we would suggest that it should use the terminology “social landlords” throughout rather than referring to Associations in the bullet points. We accept that the new regulatory standard for tenant participation will apply differently to the NIHE nevertheless for consistency we believe the terms social landlord should be used throughout the regulatory standard.
17	No Comment
18	No Comment
19	No Comment
20	No Comment
21	No Comment
22	None
23	No Comment
24	No Comment
25	Outline and Guide required to ensure practicality and equality.
26	Further examples to expand as examples to help understand & educate & assist interpretation without misguiding.
27	Yes but ensure there are supporting governances for roles and responsibilities so the participation is core.
28	The easy read version very helpful, other language versions audio and Braille formats
29	The easy read version very helpful, other language versions audio and Braille formats
30	Are tenant’s expectations reasonable? How should the representative filter them?
31	Landlord must demonstrate the voice of the tenant is at the heart of its business
32	The standard is fine as a general statement but execution in practice will be an ongoing challenge.
33	Far too vague and in practice unworkable
34	This standard should already be adhered to by social landlords
35	Should be 100 percent tenant led and designed to explain to tenants the basic principles right up to highest level of participation. Too much emphasis on strategies and no reasons as to why there is a strategy
36	Think it’s a good start and there is room for more to be added
37	This is (I suppose) is a study in transit, and over time it can be endorsed or amended
38	At the moment can't think of anything else at the moment all seems included

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
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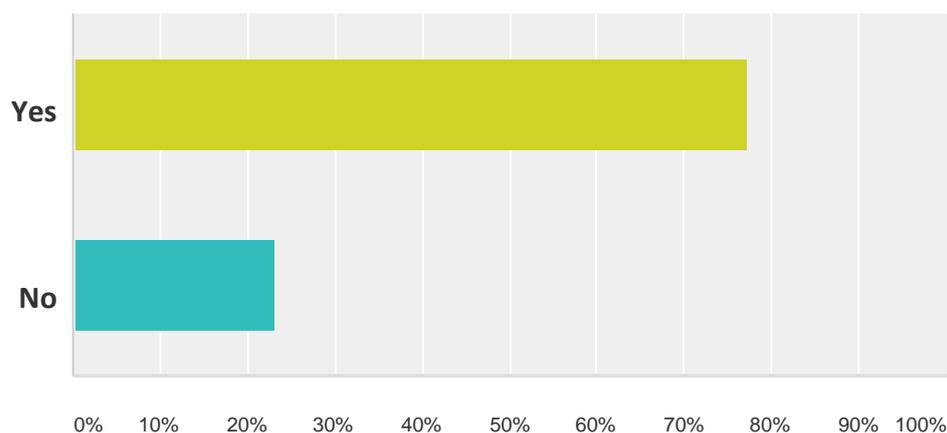
39	If they fail the regulatory standards what happens define "due regard"
40	As long as landlords are made to follow these standards as far as possible
41	At present there is no enforcement of the "golden rules"
42	Tenants should be allowed to appoint a candidate to represent the group e.g. business and political reps. How is cross community board established
43	I think a lot of tenants are badly informed as to how much say they have in their tenancy
44	But it could be made much easier for other people to understand
45	But the information should be made simple to understand
46	The wording is not user friendly; words (regulations) are just that. There needs to be a genuine approach to showing tenants that they are REAL partners rather than being paid in service
47	Open to continuous improvement and issue control (highlight chances [was/is] don't waste volunteers time) Adopt for different levels of ability and possibly allow spokesperson/carers/helper input but monitor
48	All tenants should have a proper right to participate. Gone are the days when tenants are told what to do, there should be a right for tenants to complete participation
49	Tenants and tenant groups should be shown a clear structure of bodies/department and training should be given to groups
50	I agree that tenants should feel involved
51	It is necessary the rules be more specific so that there is no chance of misunderstanding.
52	Should be a resident panel, same reason as Q2
53	Need for tenant advocate/panel to scrutinise and stay independent - set standards and held account by tenants
54	More information in leaflets to all tenants. Tenants need to be encouraged to become involved.
55	Good for tenants to be able to choose how they participate and to know what is happening
56	as long as tenants are involved/ communicated with on a regular basis (if it works for that scheme)
57	Posters displayed on all notice boards for all the tenants to be aware of
58	Making it easier to access information through modern knowledge and to be transparent through action plans of the regulatory body
59	Would need more knowledge and time to study before I feel confident to answer these questions
60	At present with information provided at this venue - it seems clear
61	Don't know would need more time to reflect on the document
62	It needs to be more readily available so that absolutely everyone is aware of it.
63	But perhaps too rigid
64	Include with sign up packs pros and cons of being involved
65	Include with sign up packs pros and cons of being involved
66	Yes already in tenants handbook and explained to them when they are having induction
67	Already exists in "sign up handbook"
68	To include in induction of new tenants
69	Standard ensures a strategy will be written and developed and makes us a landlord bring to the attention of our tenants what TP is all about. i.e. through flyers, newsletters, minutes of meetings

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70	To Who? as a housing officer I would not be in a position to communicate information to tenants
71	Right to be involved, have a say in decisions - knowledge - etc handbook
72	It is relevant and set out in clear English. It must be supported by funding
73	Provide a copy at sign up
74	Make it more readable friendly
75	The easy read is understandable to the lay person but the actual reform is very long winded and boring
76	Only if the process is adhered to. Decisions need to be based on local people having their say in

Q5 Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Answered: 153
Skipped: 18



Answer Choices	Responses
Yes	77.12% 118
No	22.88% 35
Total	153

#	Please provide you reasons
1	Yes, ultimately this may be achievable and desirable in the longer term, but with a need for caution. It would be important to ensure that Tenant Participation and the strategy, principles and standards are fully implemented and carefully reviewed before taking the next steps towards tenant empowerment. It would also be important to actively consult, inform and gauge tenant's appetite for this in the future. The current procurement rules do raise a barrier to some forms of empowerment and it would be important to ensure that any such barriers could be removed should any particular group wish to avail of these rights, were they granted.
2	Whilst in principle we support greater tenant empowerment, we do not believe that legislation should be introduced at this stage. Housing Associations in Northern Ireland are committed to tenant consultation and participation. We are committed to creating better places for those in need to live by investing in communities for current and future generations. There is no doubt supporting people to become more involved in their local community helps to foster a sense of ownership and responsibility. However, tenants and tenant Groups have different levels of skills and expertise and will require extensive capacity and community-building to enable them to benefit fully from such empowerment initiatives. We would suggest that this is something that could be kept under review.
3	Legislation should permit such introduction but not require it unless all parties agree.
4	Yes. CIH believes that a legislative framework for tenant empowerment rights would effectively support and enable tenants, who wish to do so, to participate fully in the management of their housing service.

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5	Apex supports the principle of tenant empowerment. However, at present it may be more aspirational than realistic given this is the first Strategy and the envisaged level of development required to move forward in implementing many of the basic principles of participation during the life of this first Strategy. Apex would therefore cautiously welcome this, in the knowledge that much work is required before tenants may have the necessary skills and expertise to manage. A first step in regard to empowerment as part of this Strategy could possibly be the introduction of Community Cashback. Development of empowerment may well result in an increased sense of ownership which has the potential to reduce ASB, vandalism and crime and possibly reduce turnover.
6	Tenant Empowerment is something that is highly democratic and no doubt an exciting opportunity for communities that it is relevant to. Clanmil has certain reservations and Clanmil Tenants at the Tenant Forum have articulated a level of concern about the model. The points are: • Linked to the history of conflict, political nature of housing in Northern Ireland and the need to maintain clear governance structures in housing management • Concern that a group of tenants could try and take over services unsuccessfully and against the will of some tenants • Concern that Tenant Empowerment is deemed to be the key goal whilst other options may be preferable It has also been articulated that Tenant Empowerment could be understood in a positive opportunity to reignite “neighbourliness” that is often lost in estates. Tenant Empowerment also seems to be a step in a different direction to what is outlined as Tenant Participation. Tenant Participation is about increasing involvement and engagement with tenants. Tenant Empowerment is about tenants separating themselves from the social landlord and delivering services themselves. Clanmil’s Community Development Strategy seeks to use Contractors and Social Clauses to the benefit of tenants whilst maintaining the highest quality service. This is a model that is facilitated through partnerships with training providers that can support tenants into training and employment. We see this as a model that works with our tenants and provides benefits for all as opposed to just those who are organised enough to develop their independence. Clanmil already has a scheme called Clanmil in Bloom. Through Clanmil in Bloom we allow Tenant Groups access Grounds Maintenance costs to plant flowers and shrubs in their community. This is a model that works well for our tenants whilst not fully committing to all aspects of Tenant Empowerment.
7	New Legislation would be needed to help any organisation set up to control tenant participation.NIHE have a scheme in place (FindOut)
8	No Comment
9	No Comment
10	No Comment
11	Tenants have enough control and some abuse the system. E.g. Anti social behaviour.
12	Because then they will have to do the right things
13	Procurement rules must be made in legislation before tenant groups take on the responsibility for services.
14	Again working together achieves results.
15	To become more independent
16	In some places

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17	RRF is in favour of the introduction of legislation to support tenant empowerment rights. Whilst tenant empowerment has not yet developed in NI without a change in law it cannot develop. This will allow groups of tenants to assume management responsibility for themselves should they desire to do so. Groups seeking the extension of tenant empowerment rights should be subject to a robust vetting process to ensure quality standards for tenants are maintained. Tenant empowerment could involve the management of significant public assets and in these circumstances the public interest should be protected.
18	As far as I know the law is sufficient as it stands but they could change.
19	It is fair that everyone has to adhere to the law
20	To Give everyone a fair say
21	Because it's fair there are no loopholes and it's important to do the right thing.
22	So it's fair that everyone understands
23	Because it is fair and the right thing to do.
24	Fairness for all
25	To make decisions and treatment of tenants fair and transparent and so tenants know their rights.
26	But protection of participants require guides of what can go wrong, liability etc, exclusions of minorities by change and stressing tenants a simple majority of opinion is not a fair solution for many individuals.
27	(and insurance possibly through group affiliation) Provision of legal protection and guidance should be a requirement, good example of pitfalls of pitfalls and potential problems, contract construction assistance, redevelopment.
28	Yes, but manage other aspects, too; needs more looking at possibly.
29	Rights
30	Volunteers - best approach ensure it does not fill a paid job - a cost cutting agenda to cut funding to paid staff. Right to manage - e.g. maintenance management scheme. Right to transfer - need more information to make informed decision on advantage of this transfer. Community cashback initiative - accountable and transparent not a means of procuring cheap services and cutting budgets. Protection for budgets essential going market rate for services, robust structures to safeguard against fraudulent use of cashback. Protection of money saved - not removed from future budgets - risky
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32	Is this possible/feasible under EC regulations where large companies must take the place of local companies? (no box ticked)
33	Not sure! The introduction of this particular initiative could be of benefit in rural and remote rural areas especially where housing associations have historically had resource issues in terms of management. However! * If there is not an employment opportunity associated with this then I'm not convinced the tenant group would see the benefit of being involved in management.
34	Provided any potential projects are given the much needed support and training to develop and implement. Right to transfer: - from HA to NIHE??

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35	<p>I believe this to be unrealistic at this stage of NI development in the area of communal living and responsibility. We find it very difficult to form a productive residents association in an individual scheme let alone find qualified tenants to accept legal and financial obligations. See attachment below: I separate the programme into 2 parts a) Tenant Participation - Essential b) Tenant Empowerment - impracticable in NI in this on the next generation. Fundament considerations re the "Empowerment "</p> <p>Target: 1. To what extent can willing public spirited tenants be expected to work for the benefit of others (the majority, less public spirited at their own cost (both time and money)? In My lengthy experience meaningful participation (even for scheme Residents Association comes from older tenants almost entirely i.e. from retirees on pension, with time available but usual limited money. The same would be true of the unemployed, those on benefits should they be willing to get involved. The DSD NI strategy should necessarily take account of how willing tenants could be reasonably compensated for time and expenses, rather than relying upon the notion of (unpaid) volunteers. My experience of apartment living (20 plus years in N.I., London and overseas) unfortunately highlights the real world difficulty of getting consistent tenant participation, even free movie nights. Much fewer events, come forward to volunteer for resident association committee membership (barely 10%). It will be an uphill struggle to motivate the average tenant to participate even at the minimum level, much more so to upgrade participation to landlord forum level. It is a fact of life that the average NI Tenant would bin reality have zero ambition to have the "right to manage" on to be "empowered." Expect considerable resistance. 3. Even if enough volunteers were available, they are unlikely to have the qualifications / experience to take on financial / legal responsibilities. 4. The English model cannot easily be imposed in N.I. 5. The "empowered tenant" concept is not the way forward, for many practical reasons. Unqualified tenants cannot be entrusted with day to day supervision and financial management, involving technical trades and contract management.</p>
36	<p>It will give tenants greater responsibility in their community</p>
37	<p>Would not work in single identity communities in NI. Funds would be misappropriated; tenancies would be given to friends and family. The most socially excluded would be further marginalised</p>
38	<p>I feel that it is too soon for this I feel that the concentration for now should be to get tenants participating first and then revisit this issue</p>
39	<p>Would need a lot of management and different issues not directly involved with tenant participation might become a problem. Allocations, rent collection etc</p>
40	<p>Particularly "Right to Manage" and Cashback Initiative. Right to transfer landlord may bring enormous difficulties in financial and managerial areas for new landlord if large number of new tenants wish to move</p>
41	<p>Presently I feel N Ireland is not ready for this introduction perhaps no's 1&2 (right to manage and right to transfer)</p>
42	<p>Tenant's right to manage, right to transfer. Community cashback initiative</p>
43	<p>Yes and no I believe the English model has had its ups and downs, would prefer to cherry pick the best practice bits of stock transfer etc first.</p>
44	<p>I believe the option should be there and tenants have an opportunity to uptake this involvement or not.</p>
45	<p>I do have some concerns that would need to be legislated to prevent: First Tenants should not be forced to join. Most importantly Landlords should not be permitted to have tenants do tasks in order to cut down the amount of paid staff employed. Also tenants should not be forced to take on tasks such as gardening etc unless the entire area is in agreement otherwise some tenants may be at risk of being discriminated against.</p>

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46	Because nothing gets done to those who cause antisocial behaviour especially younger ones who live in flats or apartments who do not have respect for themselves or their neighbours top below or either side. Older people should not have to do the run around to get this problem solved tenants report these problems to head office they approach perpetrators two three times and if it doesn't work you're told to contact environmental health about noise or nuisance. This is no good for older people to run about to get problems like this sorted out and cause stress and stroke high blood pressure to older people
47	Not sure, both should share
48	I think there is legislation to be put in place before any commitment towards the proposal
49	Don't believe the time is right for this at the moment. Maybe in the future this would be a good idea
50	Security and uniformity throughout social housing equality to all tenants
51	Need separate box for each of these 3 things. Right to manage - whilst good idea communities/tenant organisations may be excluded due to large commercial tendering. Right to Transfer - concerned about diminishing the stock of the NIHE: some tenants concerned they will be forced into this. (Tenants on block not individually) Community cash back initiative - again small community organisations could be excluded by the tendering/procurement process. Rent level, whilst not part of this discussion today concerns were voiced about the high level of housing association rents and service charges
52	Providing support is available to community
53	Not at the moment, in the long term if more work was done between tenants and housing associations and training was given to tenants
54	Tenant empowerment is very important and should be legislated for
55	Yes if the community takes ownership of the communities they live in it will empower the tenants to take pride in the area they live
56	It is paramount that rights are at the HELM of the process. Again transparency is important to implement a rights based process
57	We need to give tenants fair say
58	It is one sided against the NIHE
59	That way the tenant would know his or her rights
60	At this moment the tenants have no rights
61	The concept if achievable would benefit communities through providing employment, community buy in and community pride. The 3 headings are very different and would require separate responses. Right to Manage - How possible would this be - is there sufficient local resources available. Right to Transfer - Such opportunities could fragment communities e.g. this is evident with owner occupiers. Community Cashback Initiative - see initial comment
62	E.g. for flats/tower blocks lifts good example at university halls no faults when came out of common funds but obviously no money paid out accordingly. Not necessarily large projects of full transfers to be considered
63	If the levels of participation are sufficient
64	We need more participation with tenants and landlords before we have more empowerment rights
65	I don't think Northern Ireland as a whole is ready for such a big tenant empowerment strategy. Sounds as if it's just one big headache
66	Answer scored out

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67	This would give tenants more flexibility on their tenancy
68	Particularly the community cashback initiative (cashback scheme) as community groups can earn a little money doing a little work around the area they live in.
69	Groups can do work for free or can have work contracts carried out cheaper than existing government bodies, this would give more confidence in communities and create more pride in their group/area
70	Yes this will be a good idea for the future
71	I think it would encourage communities to work together in keeping their own area in a good condition
72	But I think that proper structures need to be in place first. e.g. policies , finance / governance / Housing Associations and HE highly developed partnership to be in place first. Participation to be worked on first.
73	Volunteers could work and the cashback model would suit our area. This should be pursued
74	I Believe this process should be phased in and not immediately enforced. As tenant participation needs to be encouraged in the first instance.
75	Something to be for the future a good ideas cashback tenant should be made to keep their own areas clean.
76	To secure and promote greater participation while delineating the specific rights and responsibilities of both tenants and landlords.
77	Going back to Q3 yes so as all groups tenants aren't doing something that's not lawful
78	Right manage Right Transfer Cash Back All on the long finger.
79	For the future, need to get participation levels up first. Right to transfer should be re considered.
80	But possible not yet as tenants need to be introduced to participation first before management and transfers. Only can transfer from NIHE to HA not other away around - no guidelines on scale on right to manage. community service agreements already happening in NIHE - what about HA
81	Need to take further steps to get there
82	Legislation on tenant empowerment rights will give tenants some form of back up and refer to whom required.
83	You would need more checks and tenants would be interested now in their own scheme rather than other schemes.
84	Right to transfer should be equal for either NIHE a and HA Tenants - Right to manage ok whilst tenants interested but if this interest dwindles who is left managing what is left? E.G. Landscape gardens which are diminishing where HA would have kept as grass initially and easily maintained in comparison
85	Difficult to manage tenants rights as it is - too much power/rights would be ever more & nightmare from housing management point of view
86	Regulates the system/procedures - ensures all practice remains fair for all tenants, publish guidelines would be required to ensure this is manageable for tenants and social landlords
87	This scheme may encourage residents to become more involved; some tenants may already be carrying out this type of work already but are not being rewarded
88	I would have worries concerning all tenants in a scheme agreeing to this
89	Unsure as they may set themselves up to fail because of the financial situation today there may not be much funding available

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90	Yes for NIHE no for HA's. I don't think this is suitable for HA's with mixed funding regime. I see the value of it for NIHE if tenants are trained and empowered
91	Tenants should be involved in the management of services that are provided. Tenants should take more control
92	Tenants should be involved in the management of services that's provided
93	Partly agree as it would have to be very well organised and it may end up being a very transient board as people come in and out of communities regularly.
94	Empowerment is always good, but as long as it is regulated so legislation would manage it properly
95	Serious concerns about mutuality of points - management of transfer - yes. community cashback on repairs - no.
96	Yes to transfer - as long as tenants were empowered to make informed choices - or alongside management team definite involved
97	If tenants want to manage or be involved in managing their own affairs they should have the opportunity to do so. Many tenants have considerable experience in all sorts of areas and should be allowed to uses their expertise if they wish to.
98	Because tenants understand the needs of their local community and are best placed to make local decisions
99	It would give tenants more ownership of their community and hopefully would lead to healthier and happier environments.
100	It would give tenants more pride in their area and in maintaining their homes. Ensures all tenants are included in any decisions.
101	If it advantages the community it is a good resource of funding.
102	This would definitely give the tenants a sense of worth and understanding of the management issues facing the HA. An excellent idea for schemes that have the knowledge required to do this
103	Sometimes tenants can get too domineering in what they want and not what other tenants want
104	This could be difficult - as some tenants can be demanding and difficult to reason with
105	Enables choice dignity and flexibility to meet with tenant needs
106	Empowerment is essential as tenants feel valued and they are involved in decision making in their own scheme, in regional schemes. Cashback gives incentive as shows appreciation of good tenancy
107	I feel this would be valuable to tenants
108	This will give tenants a real interest in their own communities and a sense of worth in their own community. tenants know best what gives
109	What would be the need for manager/co-coordinators etc - can't see this working with a group of individuals
110	No to management roles - no need for SCO in that case. Yes to right to transfer
111	No to management roles - no need for SCO in that case. Yes to right to transfer
112	Good idea - as long as all tenants agreed
113	What would the management team then be responsible for - what if tenants were not all in agreement - who would mediate/negotiate?

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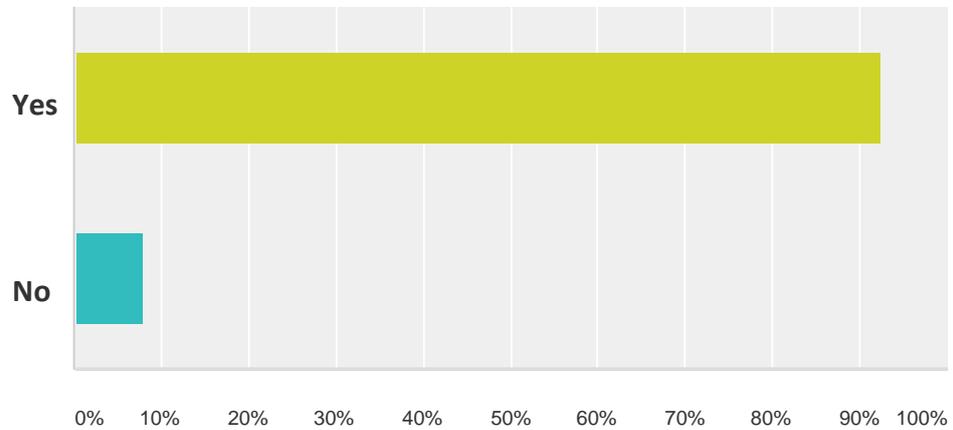
114	To a certain extent - I think strict guidelines would need to be in place to ensure fairness etc. Also it may not work in every HA scheme environment - at least to a full extent
115	Gives tenants a voice, control as their own home helps them feel heard, helps to make right decisions
116	Need to start with basics first and get tenants involved with one services, make change, influence policy and onto boards before empowerment would kick in
117	Tenants have neither training nor qualifications in this area and no knowledge of policy or procedures. This should be left to fully qualified housing staff!
118	Staff within my housing organisation are professionals, have been suitably qualified to make decisions and are knowledgeable about housing law, maintenance etc. Tenants would not likely be able to make reliable recommendations or educated relevant decisions based on financial restrictions, law etc. They are already involved at a basic level to raise concerns etc. but they shouldn't have decision making "rights" as such
119	Definitely not. There are already in the majority of scheme conflict of interest/personality clashes amongst tenants. To provide tenants with management responsibility would be a disaster. To get involved in community work only could be considered
120	It is good for the tenants to be involved/consulted on such issues as, they are in receipt of the service, however, I do not feel they should have control and ultimately, everything should be regulated by management before approval
121	This scheme would only work with particular tenants. Other tenants would abuse their position and have a negative impact on scheme and the tenants living there could feel isolated.
122	"Riots" tenants have no understanding of policies and procedures. Not every tenant would be committed and professional in their approach. Should not be given budget management * staff would be put at a very high risk, leaving it very unmanageable
123	Giving tenants too much control undermines the co-ordinators role
124	Sometimes too much empowerment can get out of control, there should be boundaries
125	Will enable tenants to take control of their own homes, manage the schemes in a way where they can be run the way they want but could affect housing management in that for LL it would be hard to manage.
126	Too much tenant empowerment would be extremely difficult to manage and affect housing management, although I agree with the community cashback scheme
127	Good practice across the social housing sector should be encouraged and developed voluntarily before placing obligations on providers through legislation
128	The rewards are greater
129	A lot of tenants want more say with what happens with their money
130	Good if you have tenants with relevant skills to manage small projects - most tenants move into sheltered to retire and not have so many decisions to make
131	If legislation was introduced, tenants who do not receive H/B would not be able to participate compared to tenants who work to pay their own rent - do not have time to engage in projects
132	Tenants come from all different backgrounds and some need incentive and other ways to engage if they can't make it to meetings etc. i.e. work commitments, family/health etc.
133	I feel tenants in the schemes already help with managing projects within the schemes etc. 10 tenants choose to help with lunch club etc, do gardens and have passed level 2 in food safety

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134	N/A re Housing association. re Housing Ex if it comes in, part of this may apply to other schemes
135	My scheme have social committee instead of a formal tenant participant where they discuss and decide what they want to do at scheme level
136	Money back into community to provide other amenities
137	It doesn't matter if it's a large housing estate or a small sheltered scheme, the tenants pay their rent to a social housing provider and by allowing them to exercise their rights, gives them empowerment to their local community and a sense of inclusion.
138	Agree with tenants rights, the description of how the process would work seems complicated and would need a great deal of management, strict procedures/audit trails
139	Yes, providing it is not a veil for lack of progress.

**Q6 Do you agree with the findings in the
Impact Assessment screening reports?**

Answered: 141
Skipped: 30



Answer Choices	Responses
Yes	92.20% 130
No	7.80% 11
Total	141

#	Please provide you reasons
1	This strategy would indeed have a positive impact for all groups if fully implemented.
2	Yes we agree with these findings.
3	Effective tenant participation, especially involving special needs residents, can break down barriers arising from section 75 status and/or geographic location.
4	No Comment
5	No Comment
6	No Comment
7	No Comment
8	No Comment.
9	Well I hope so.
10	Tenant participation strategy consultation document must be explained to tenant groups by a qualified person.
11	Yes I agree it would have a positive impact on all groups.
12	Everybody has the right
13	Accountability on both sides
14	Yes it is clear and inclusive
15	No comment
16	Young people missing from all groups.

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17	Young people are missing from document.
18	No Comment
19	No Comment
20	It is understandable and fair.
21	Mostly but middle age people and very young not represented as much in photos.
22	But still don't know until all info back
23	Positive discrimination may be required to ensure equality e.g. rural proofing & section 75
24	As long as the screening process has included the involvement of experts in the relevant area I would adhere to skills.
25	Equality not them and us, we impact on what's gone on. Recognise differences in rural communities
26	(no box ticked)
27	The assessment has considered every conceivable angle and the conclusion are reasonable and fair. My only concern is the viability of empowerment in N.I Other than in the distant future.
28	Presentation strongly suggested that tenant participation would vary widely across the range of social landlords so how could an impact assessment be completed? What model/standard was assessed???
29	Appropriate assessment must be undertaken if any reform programme will be successful
30	It looks to me that the Department have explored all the options but I do feel sometimes no matter what you do you will not please everyone
31	Areas covered meet requirements of association and highlight areas that benefit those tenants/groups that ask to be involved at lots or very intensive levels
32	Covers the range of differing social housing tenancies as well as legislative requirements
33	Good identification of rural and industrial communities
34	As stated it will have a positive impact for all groups
35	I see nothing within the strategy to suggest any kind of discrimination. The strategy not only considers the needs of the tenants but also the objectives of the housing associations etc.
36	I still feel strongly that Impact Assessments are not considered necessary as they are.
37	Good housing, flats for decent people put the troublemakers into flats that is suitable for them only anti social behaviour drug dealers alcoholics and no respect for decent people
38	Should be discussed more
39	It's a win/win situation
40	I don't believe there are any adverse effects
41	As it should be. Perhaps a few tweaks required after this survey has been collated
42	Equality and fair treatment should be a matter of fact
43	It's a fake no comment
44	Don't think all in the community had a fair input. The fundamental issues are not addressed
45	Reduction of inequalities especially in the audit of peoples application for social housing as many applicants make false statements
46	Myself and others would not mind this policy assessment and hope to see it work
47	We will have to wait and see how the policy works out - needs more feedback

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48	The 4 groupings are all encompassing. At a micro level social housing (accessibility) has the greatest negative impact for singles especially males
49	Open to continuous evolution should be able to expand and include all social housing i.e. Those who live in a house for life and not for profit and help accordingly (both boxes ticked)
50	It includes rural proofing (so many decisions don't)
51	If carried out it seems to cover all areas
52	We as a community would like to see more of a positive impact that would see the tenants and social housing make these rules and assessments from information and feedback from the tenants themselves
53	The 4 Below Section 75 regulatory & Rural Proofing and Social Inclusion
54	It takes into consideration for everyone
55	This will improve the regulation
56	It's important to not have a one size fits all / administration shouldn't be as cumbersome. It should reflect needs of your group and keep cognizance of this so that no one is discriminated against.
57	Fold Social housing in Cullybacky is brilliant they look after tenants and houses very well. Their house are far better than housing executive
58	Because I don't think people from this country are ready for different communities, meaning to mix some towns might be ok some not with luck it will all come together some day. different town different thinking
59	I believe that proper consultations have been carried out by the department
60	Needs to be fully inclusive and to ensure that all tenants / Residents are able to be heard.
61	Happy to see rural proofing is included
62	Finding scan help with moving forward for better outcomes.
63	Yes but will the money be available to introduce it and keep it moving.
64	However would the role of the social landlord be lost or involved in relation to participation?
65	Unsure of meaning
66	This is offering all groups of tenants to be empowered and voice their opinions and needs. They have the opportunity and can take it or leave it.
67	Important to include everybody
68	I haven't been able to read the full assessment so therefore I am not willing to comment with lack of information
69	I didn't have enough time to fully look through the report as it was only given on the morning of the conference. It would have been more advantageous to receive the information beforehand
70	Don't know at present. With not having had time to fully read the document I cannot give an assessment at present
71	It is difficult to say as not familiar and lack of time really to reflect
72	It gives opportunities for hard to reach tenants to have a voice
73	I am concerned that some older tenants (who may have very little schooling) will feel it elitist. (I have some tenants who get v jealous of the tenants who do take an interest).
74	As it is xxx under section 75. Everyone should be included

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75	I have only had a skim over these pages but on a cursory level they seem to be findings that I would agree with
76	I have not got a chance to read it properly
77	This is in accordance with section 75 of the WI act 1998. To ensure no one is excluded offers equality
78	It has offered equality and engagement for tenant voice
79	This is in accordance with Act 75 of Northern Ireland to promote Equality in all sections and no one is excluded
80	This in accordance with act 75 at Northern Ireland to promote equality at all sections and no one is excluded
81	I believe it covers all aspects
82	Although not all tenants are interested
83	maybe not all tenants will be interested
84	All groups are included and it appears there are opportunities for all sections/persons and become involved.
85	More focus and support has to be put on housing providers as they have a very difficult job managing tenants and providing a service. "We can please some of the people some of the time but not all of the people all of the time" we can only do our best
86	Those tenants who are currently involved in the TP group within Oaklee Trinity are in most cases strong/overpowering personalities who greatly influence, in negative ways, other tenants in a scheme. Many TP members have their own agenda
87	Ultimately as tenants are in receipt of the service provided by housing associations, they therefore are the best people to consult on improving the service
88	Leave housing management very hard to "manage" "Policies and procedures exist for a reason"
89	Tenant Participation should involve all people from different backgrounds, regardless of social setting or demography of location. All tenants want a voice to be heard so if all are being heard then there should be no adverse impact
90	Tenant participation should at no way discriminate and give all the tenants of adverse backgrounds a voice.
91	Can't agree as there is insufficient detail in the findings. Choice experience is that older tenants engage more in tenant participation; younger tenants with more mundane responsibilities cannot offer the same commitment
92	Cannot provide an answer as would have needed to have the impact assessment literature before today
93	? Have not enough information to give an answer
94	Always good to help vulnerable groups
95	All reports should be transparent
96	Everyone has the right to access what is reported
97	They seem to be top down and don't really recognise the hard facts that currently reside in the community.

Apex Supported living;

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

- By ensuring specific tenant participation strategies are developed by Social Landlords*
- By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways*

Please provide your reasons

Apex Housing Association Supported living department has developed and implemented a community involvement strategy, maximising the input by tenants of Mental Health, Learning Disabilities, Hostel, sheltered accommodation, Housing with Care and Nursing. As outlined in the Apex strategy we provide tenants a mechanism to shape their community through:

- **Information** – set up and attend meetings with the tenants.
- **Consultation** – each discipline has a focus group where the senior housing officer consults on key themes /policies and takes feedback and suggestions, on how Apex can improve service delivery.
- **Participation** - all supported living schemes participate in satisfaction surveys, tenant meeting and focus groups. All tenants are encouraged for their suggestions / points of view in these forums.

Apex can clearly demonstrate their achievements of the standards by good feedback, tenant's satisfaction surveys and meetings. Records of tenant meetings on all schemes are readily available. The focus group meetings are minuted and are available. Apex will measure the impact of community involvement by reviewing progress, monitor outcomes and seek continuous improvement.

2. Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

- Yes
- No

Please explain

The supported living tenant participation service already meets the 10 principles' developed by the department. In addition we ensure that we empower our tenants by constantly improving the services we deliver. We are committed to sharing information, consulting with our tenants on decisions that affect them and promote opportunities for them to become involved.

3. Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

- Yes
- No

Please provide your reasons - This independent tenant support organisation could facilitate

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representatives of Supported Living tenants from all social housing providers this would enable best practice throughout Supported Living schemes in N Ireland.

4. Is the regulatory standard clear and understandable? If not, what more would you include?

Yes

No

In this case, the regulatory standard is more clear and understandable for supported living schemes; Apex's Community Involvement Guidance document for supported living compliments the regulatory standards

5. Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i. e. right to manage and right to transfer or community cash back scheme?

Yes

No

Please provide you reasons

As this consultation document is the first Tenant Participation Strategy for NI it is the view of Apex there would need to be clear guidelines around tenant empowerment rights particularly in relation to supported living tenants.

6. Do you agree with the findings in the Impact Assessment screening reports?

Yes

No

Please provide you reasons - Apex is of the view that DSD are familiar with carrying out Impact Assessment screening on reports and is confident in the view of the Department that a full impact assessment is not required.

Ballymurphy Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

Develop Forums similar to the case studies in Scotland etc, NIHE & Social Housing Community Networks were Tenants can be involved whether as an individual or in a residents/tenants group on a genuine joint partnership and equal basis to insure there is “housing structures that support the provision of social and affordable homes, in thriving communities where people are proud to live”.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

Yes No

Please explain

Build on good practice already in place i.e. NIHE Housing Community Networks compacts and develop policies that Landlords can sign up to with regard the three points to foster greater participation and the social landlord’s strategy for tenant participation should reflect the *10 principles for tenant participation* included in the DSD Document.

- Develop and deliver a strategy for tenant participation;
- Have due regard for the information contained in this strategy, particularly the standards set out in Appendix B, when developing or reviewing their own strategy;
- Ensure that tenants and other users are made aware of and are clear about the participation activities and strategic approach to tenant participation.

The important thing is that tenants and other users are made aware of opportunities for participation and encouraged to participate. Tenants should find it easy to access information.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

This development would need “minimal change” in that Housing Associations start to work closely with community, tenants through NIHE & DSD structures and policies. The Department should further consider strengthening and developing the NIHE tenant support mechanisms already in place but also involving through new policy the support and participation of Housing Development Associations’ in genuine working partnerships with tenants and the community similar to those set up by

NIHE and that NIHE act as the tenant participation advisory service under the Housing Community Network similar to TPAS supported by and accountable to the DSD and local government. As stated within the document The Housing Executive has involved residents and local community associations in discussing and developing local services and addressing housing issues for many years has a wide network of community groups and has an established Housing Community Network which has different tiers of involvement which meets monthly. The network has evolved and the new community inclusion strategy has tenants involved in area scrutiny panels, inter-agency partnerships and working with difficult to reach groups. All policy changes are discussed and consulted at central forum. The Tenant, community and NIHE

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons

Empowering residents builds and maintains strong and cohesive estates, tenants should be consulted and given opportunities to develop joint policies and proposals with Housing Associations’ and landlords over any change in policy, i.e. Tenant contracts under any new tenant should include 6months probationary period monitoring lasting for at least 2years in relation to possible anti-social or criminal issues, although given that the waiting lists are still increasing and there is still so much

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demand from applicants there should be a policy on looking at equal numbers of Transfers within each new housing development to get better use of NIHE and Housing Associations Housing Stock.

Good practice examples should be funded and supported within supporting tenant empowerment such as parks and gardens projects, community activities and tenant initiatives including young advisors and leader's programmes, outreach service for vulnerable residents, fun days and events, community safety, focus groups, surveys, housing surgeries.

Concern is expressed over awareness of the cost of providing accommodation to meet demand in terms of those under-occupying and existing applicants on the Waiting list; There needs to be agreement that one-bed properties should not be added to any new social housing programme – this is seen as going against the work that has been done across the city to build sustainable communities; Flats in particular are seen as contributing to ASB and social isolation; There will be ongoing need for family accommodation, as families appear back on the Waiting List following repossessions – want to avoid creating undesirable accommodation; One-bed accommodation does not fit with housing association construction to Lifetime Homes standard. Any possibility of loss of Direct Payment to landlords, suggesting that rent would be last of tenants' priorities when monthly budgeting. Direct Payment is seen as an important 'safeguard' for those on benefits, so that they do not need to budget monthly for rent. This is especially applicable given the considerable housing of vulnerable people by NIHE and Housing Associations'; advice should be available for vulnerable people.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes No

Please provide you reasons

Name of Respondent _____ Liam Stone _____

E-mail contact liamstone56@outlook.com

Please specify if you are:

NIHE Tenant
Housing Association Tenant
Other

Please provide Organisation Name: Ballymurphy Residents Association

Ballynahinch Support Group

Dear Sir/Madam

I welcome and support the above Strategy and Consultation.

It is important that a professional body is appointed and put in place, to represent and support tenants, carers, all and to provide other professional support when and where required and needed.

Also, to have on-going professional support and service available, to be updated regularly reviewed, researched, and with opportunities for feedback and opportunities for necessary follow up action to be put in place and carried out, at all times, for tenants, all and carers for the future.

Appropriate professional training and opportunities for this to be made available and provided for tenants, all and carers, for the health and well being of the above Strategy and for the future.

Thank you for your help.

Best regards

Carmel

Carmel Costello, Vice-Chair, Trustee

Ballynahinch Support Group

155 Dunmore Road

Ballynahinch BT24 8QQ

T: 028 9756 2057

E: carmelcost@yahoo.com

Beechmount Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

✓ By ensuring specific tenant participation strategies are developed by Social Landlords (With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes ✓ No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods, in itself, is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in determining positive consistent communities.

It is relatively easy to demonstrate how you achieved tenant participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes ✓ No

Please provide your reasons

As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes ✓ No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes ✓ No

Please provide you reasons,

This could offer other avenues of community development via environmental and physical regeneration. However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.

Central Housing Forum (HCN)



c/o 34 Clonmakane Court
Caw
Londonderry
BT47 6BZ

27th March 2015

Tenant Participation Strategy Consultation,
Social Housing Reform Programme,
Ground Floor Lighthouse Building,
Gasworks Business Park,
Belfast
BT27JB

Dear Sir/Madam,

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

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

As you are aware, the Central Housing Forum has been acting as a sounding board to the Housing Executive on policy and customer/tenant involvement for the past 16 years and operates as part of the Housing Community Network (HCN) – the framework by which the Housing Executive successfully engages with its customers at a Regional, Area and District level. All tiers of the Housing Community Network, including the Central HF, are ably supported by Supporting Communities NI (SCNI) as is reflected in the draft Tenant Participation (TP) Strategy itself.

The comments outlined in this response are informed by the Central Housing Forum's involvement in the Social Housing Reform Programme (SHRP) over the past 2 years i.e. since we met the then Minister for Social Development, Nelson McCausland in June 2013 to discuss the initial stages of the Reform Programme. We are therefore delighted that this much needed TP Strategy has come forward as a result of our input, along with other stakeholders, into ensuring consistency of approach in terms of the delivery of tenant participation across all social landlords in N. Ireland.

We, as a Forum, acknowledge the references within the draft TP Strategy to the best practice engagement of the Central Housing Forum and the other tiers of the HCN in our workings with the Housing Executive and can only commend other social landlords to follow a similar path. Obviously, our input has been greatly facilitated by the support provided by SCNI over the years and we feel that similar independent support should be applied consistently across all landlords in N. Ireland, thus ensuring that a minimum standard of independent service and

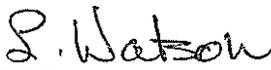
support is provided for all landlords.

The Central Housing Forum also commends the work undertaken by the SHRP Team in engaging with the members of the HCN through various Consultation Sessions across the Housing Executive's 3 Regions and we thank the Housing Executive and SCNI for facilitating these sessions also.

This response from the Central Housing Forum can be seen as an additional contribution to the feedback received from other HCN members at these Regional sessions.

I hope you find these and the attached comments useful to the ongoing consultation process.

Yours faithfully,



Linda Watson
Chairperson

Draft Tenant Participation Strategy 2015-2020

Comments from Central Housing Forum

Q.1 How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

- Central HF Members felt that Housing Associations DO need to have a strategy/document, similar to the Community Involvement Strategy as produced by the Housing Executive in association with the Central HF. A requirement to have such a document could be used to ensure all landlords are meeting the principles and standards detailed within their respective strategy documents.
- There is a need for sanctions/penalties to be included if these principles/standards are not met- and the DSD need to clarify what these might be.
- Need for **minimum** standards and a **consistency** of approach for both Housing Associations and Housing Executive.
- It was noted that Central HF members meet with the Housing Exec Board twice a year as per the Community Involvement Strategy and continue to shape and change the delivery of Housing Exec services which impact on tenants. This should be seen as good practice for other tenant involvement structures.

Q.2 Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

- Members agreed that the 10x principles and standards are 'fair and appropriate'.
- It was agreed that there was a need to interface outcomes with people who bought their social housing homes and those who may have let these homes - where is the opportunity for their voices to be heard?
- Members queried what the sanctions would be put in place should landlords not meet the standards set?

Q.3 Do you think that the Department should support the development of an independent tenant support organization in Northern Ireland?

- Members queried the term 'support' and definition of what this all entailed?
- Who will fund this independent tenant support- no guarantees given by DSD within document; should Landlords pay for this support themselves or make contribution to cost? Show some commitment to tenant participation.
- Agreed that there is a need for an 'independent' support organisation- reference made to SCNI and the good work played in working with the Housing Exec in supporting the HCN.
- Housing Exec engages SCNI, some Housing Associations avail of SCNI services on an ad hoc basis already- why not utilise their expertise to support all landlords in a co-ordinated manner?
- Note-do not want large organisations coming in from outside Northern Ireland and undercutting local organisations - need for a quality of service and not just based on cost.

Q.4 Is the Regulatory Standard clear and understandable?

- Agreed that the Regulatory Standards were 'clear and understandable'.
- Members queried what was meant by 'due regard'?
- Who will regulate the tenant participation standards?-example of independent body like Scottish Housing Regulator which has involvement of tenants on it identified as best practice and which could be replicated in N Ireland.

- Tenant Advocate- possible role of an elected tenant/resident Advocate body?
- Need for effective structures for advocacy and accountability to be put in place
- What is the linkage between Tenant Advocate and new Councils?
- Housing Advisory Panel- who will sit on this panel? Tenants (HEX and HA) need to be represented on it as well as landlords themselves and organisations such as SCNI and NIFHA.

Q.S Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights- ie: Right to Manage, Right to Transfer or Community Cashback Scheme?

- Agreed with these Empowerment Rights in principle- as long as guidelines were rigid and enforced.
- Members agreed that the Right to manage; and the Right to Transfer should also apply to Housing Associations (reference to size and economy of scale). Need to establish what the appetite is among tenants for these empowerment rights- carry out some research.
- Needs to be proper support and capacity building provided before Right to Manage is considered.
- Independent advocacy role essential if any Transfer of landlords is to be considered in the future.
- Housing Exec already operate Community Service Agreements – similar to Community Cashback Scheme. Although limited at the moment-could grow in the future & build on social enterprise approach.

Chartered Institute of Housing (CIH)



Consultation Response from the Chartered Institute of Housing in Northern Ireland
April 2015

A TENANT PARTICIPATION STRATEGY FOR NORTHERN IRELAND 2015 – 2020

**Consultation Response from the Chartered Institute of Housing in Northern
Ireland**

April 2015

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

Our priorities for a housing system that works for everyone in Northern Ireland are:

Housing supply. We want there to be enough good quality homes to meet the needs of our growing population and to support economic growth.

Welfare, access and affordability. Everyone should have access to and be able to afford a home which meets their needs.

More than bricks and mortar. Good housing helps people live well, enjoy better health and achieve their full potential.



Consultation Response from the Chartered Institute of Housing in Northern Ireland
April 2013

General comments

CIH welcomes this strategy as a vital step towards enabling tenants to participate fully in the development, management and assessment of their housing service. We welcome DSD's approach in working with stakeholders and seeking out tenants' views as part of the consultation process.

Broadly we support the direction and content of the strategy. We acknowledge and encourage the proposed link in with the regulatory framework, and we believe the regulator should be tasked with the roles and powers outlined in our response to question four in order to support tenant participation. We feel there should be a requirement for all social landlords to have a plan for tenant participation development and expansion.

Consultation questions

1. How do you feel the Department can challenge social landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

CIH notes that there is no requirement for social landlords to have a tenant participation strategy; "social landlords may decide to produce a specific tenant participation strategy to meet our expectations. Others may wish to put the relevant information into tenant handbooks or other documents. Either approach is valid" (p.20).

We agree with DSD that requirements should be commensurate to the landlord's function – namely their aims and objectives, customer profile, and/or size. We also acknowledge that some landlords have very effective tenant engagement that doesn't need intricate or complex structures in order to take place.

Nevertheless, we feel there should be a requirement for all social landlords to have a plan for tenant participation development and expansion. Such a plan would support a focus on continuous improvement throughout the organisation that in turn commands stakeholder confidence, while still reflecting the social landlord's unique circumstances. We also feel this approach would assist DSD in challenging social landlords to increase the extent and effectiveness of tenant participation in Northern Ireland.



Consultation Response from the Chartered Institute of Housing in Northern Ireland
April 2015

2. Do you think the things we expect of a social landlord's strategic approach to tenant participation are appropriate and fair? Please explain.

Yes, and CIH acknowledges and encourages the proposed link in with the regulatory framework. We agree with DSD that requirements be commensurate to the landlord's function – namely their aims and objectives, customer profile, and/or size.

3. Do you agree that the Department should support the development of independent tenant support in Northern Ireland? Please provide your reasons.

Yes. CIH's education and training function supports tenant involvement and resident scrutiny, and we also acknowledge the work of Supporting Communities NI. We support any increase in variety of and improvement to local structures and methodology that provide support, advice and guidance to tenants and tenant groups; and that act as a conduit for and enhancer of tenants' voices and concerns as individuals and as groups. Independent tenant support can help tenants work well, raise the quality of their work, and share experiences and expectations with others in their tenant participation activities.

4. Is the regulatory standard clear and understandable? If not, what more would you include?

Yes, and CIH acknowledges and encourages the proposed link in with the regulatory framework. The regulator should require information about; monitor; and be able to intervene fully under this tenant/customer role and not just an economic role – evidence of poor resident empowerment and opportunities for involvement should be a trigger for regulatory intervention to support residents and so that its importance is underlined. This regulatory standard should ensure the provision of high quality services to tenants and service users through regulatory mechanisms.

We also feel that an effective regulatory framework should give residents access to information and enable them to do something with it. The regulator should a) ensure that social landlords have a basket of resident-focused performance indicators and b) provide comparative performance data. Social landlords should enable residents to act on this data, drawing on independent information and tenant support.

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Consultation Response from the Chartered Institute of Housing in Northern Ireland
April 2015

5. Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme? Please provide your reasons.

Yes. CIH believes that a legislative framework for tenant empowerment rights would effectively support and enable tenants, who wish to do so, to participate fully in the management of their housing service.

6. Do you agree with the findings in the Impact Assessment screening reports? Please provide your reasons.

Effective tenant participation, especially involving special needs residents, can break down barriers arising from section 75 status and/or geographic location.

For more information please contact

Justin Cartwright

Policy and Public Affairs Officer

Chartered Institute of Housing in Northern Ireland

P: 028 9077 8222

DD: 028 9078 7733

M: 07824 304 351

E: justin.cartwright@cih.org

Clonard Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

✓ By ensuring specific tenant participation strategies are developed by Social Landlords
(With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes ✓ No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods in itself is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in determining positive consistent communities. It is relatively easy to demonstrate how you achieved tenant

participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons,

This could offer other avenues of community development via environmental and physical regeneration. However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.
- Learning from historical knowledge as what works best in an area (in design terms).
- Taking learning from NIHE in relation to design and participation with tenants, such as in the area of the 'on the ground' and accessible maintenance officers.

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes

Please provide you reasons

Name of Respondent Clonard Residents Association
E-mail contact seanclndp@yahoo.ie

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other
Owner occupiers

Please provide Organisation Name: Clonard Residents Association

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Covenanter

Dear Sirs

This Association has no comment to offer on this consultation.

Regards

Valerie

V McKay

Secretary

Covenanter Residential Association Ltd

Disability Action



**Department for Social Development
A Tenant Participation Strategy for Northern
Ireland 2015 - 2020**

**Disability Action's Response
March 2015**

Any enquiry concerning this document should be made to

Kevin Doherty

Chief Executive

Disability Action

Portside Business Park

189 Airport Road West

Belfast

BT3 9ED

Tel: 028 90 297880 Fax 028 90 297881

Textphone: 028 90 297882

Website: www.disabilityaction.org

Email: hq@disabilityaction.org

INTRODUCTION

- 1 Disability Action is a pioneering Northern Ireland charity working with and for people with disabilities. We work with our members to provide information, training, transport awareness programmes and representation for people regardless of their disability; whether that is physical, mental, sensory, hidden or learning disability.
- 2 21% of adults and 6% of children in Northern Ireland have a disability and the incidence is higher here than in the rest of the United Kingdom. Over one quarter of all families here are affected
- 3 As a campaigning body, we work to bring about positive change to the social, economic and cultural life of people with disabilities and consequently our entire community. In pursuit of our aims we serve 45,000 people each year.
- 4 Our network of services is provided via our Headquarters in Belfast and in three regional offices in Carrickfergus, Derry and Dungannon.
- 5 Disability Action welcomes the opportunity to respond to this draft and to aid our response has put the relevant page/paragraph of the draft in brackets at the end of our comments.

SPECIFIC COMMENTARY

- 6 Disability Action is dismayed that this document has not been offered in a range of alternative formats. Disability Action strongly recommends that a statement offering a range of accessible formats should be placed at the beginning of the main consultation document and in any future documents for ease of reference. (Cover Letter)
- 7 Disability Action believes that as the Tenant Participation Strategy is a new concept that good practice should dictate that a comprehensive review of the Strategy should be carried out within 3 years rather than 5 as this would highlight early areas that need to be adjusted and appropriate next steps. (Page 9)
- 8 To ensure that the rights of people with disabilities underpin the 10 principles for tenant participation Disability Action would recommend the UN Convention on the Rights of Persons with Disabilities as a framework to underpin both the content and delivery of this Strategy.
- 9 In particular, Disability Action would refer the Department for Social Development to address:-

- Article 4.3 – general obligations which specifically address the involvement of people with disabilities.
 - Article 19 – living independently and being included in the community.
- 10 Regarding Principle 1 Disability Action would recommend the Department to rewrite the text as follows “... of mutual trust, respect and **meaningful** partnership between tenants...” (Page 22)
 - 11 Regarding the methods outlined for social landlords’ tenants being made aware of opportunities for participation and encouraged to participate, Disability Action believes that robust direction from the Department is required in this area to ensure transparency and consistency of approach. (Page 24)
 - 12 Regarding encouraging underrepresented groups for social landlords who find this a new concept Disability Action believes that the Department should provide guidance. (Page 24)
 - 13 Regarding social landlord strategies Disability Action would ask if the Department has considered compliance criteria to enable informed comment to be made. (Page 25)
 - 14 Disability Action agrees that the Department should support the development of an independent tenant support and would recommend that such a body should have training in equality legislation including Section 75 obligations and UNCRPD.
 - 15 Additionally, such a body must have cognisance of the Section 75 groups who have different individual issues and barriers to participation, in particular, people with disabilities who require encouragement and support to engagement effectively.
 - 16 For effective engagement for disabled people this will entail ensuring the full range of accessible information available in appropriate formats. Specific capacity building training may be required to enable disabled people to participate in an informed and more equal powerbase. It is also imperative that other practical issues eg transport, venues, times of meetings, interpreters are available and, most importantly, necessary resources allocated.

- 17** Disability Action recommends that the Department ensures that the planned independent body members and other relevant stakeholders are trained on equality law on UN Convention on the Rights of Persons with Disabilities. There must also be specific training in regard to the 9 groups listed under Section 75. Training must be an ongoing process and the rollout process should be clearly defined with the Terms of Reference. In turn, such training and issues must be cascaded down to social landlords to ensure the aims and objectives of this Strategy are achieved. (Page 26)
- 18** Disability Action welcomes the planned regulation to support this Strategy however recommends specific consultation on the new regulatory standard for tenant participation. (Page 28)
- 19** Disability Action welcomes the planned introduction of legislation and the development of an independent tenant support organisation to support the tenant empowerment rights. (Page 30)

Additionally, Disability Action believes that to date NIHE and Supporting Communities NI provide a “practical” example of good practice, in particular, the NIHE Disability Forum.

- 20** Disability Action welcomes the commitments outlined and recommends the involvement of tenants in their development from the beginning of the process. (Page 31)
- 21** Additionally, Disability Action recommends that tenants be involved in the design, implementation and monitoring and evaluation of the action plan. (Page 34)
- 22** Disability Action believes that this Strategy should have been subjected to a fully EQIA.

Regarding the Section 75 screening exercise Disability Action recommends that if this consultation highlights adverse impacts on any of the Section 75 groups then the screening process must be reviewed.

- 23** Disability Action is concerned that the Department has not inputted a system to monitor across the nine categories listed under Section 75 nor committed to revising this policy if monitoring over a two year period results in greater adverse impact than predicted. Disability Action refers the Department to paragraphs 7.1, 7.2, Pages 76-77 of

the Equality Commission for Northern Ireland's Revised Guide to Statutory Duties.

- 24** Disability Action recommends that **all** policies emanating from the Strategy must be subjected to Section 75 screening process.
- 25** Disability Action notes the absence of any reference to cross-departmental and agency partnership implications, for example, DHSSPS and 5 Health Trusts.
- 26** Disability Action is concerned that there is little reference in the document in regard to the allocation of resources. Disability Action would ask what mechanisms will be put in place to ensure that funding is made available at the correct time and place.

CONCLUSION

- 27** Disability Action recognises the time and effort that have gone into producing this document for consultation and thanks the Department for the opportunity to respond and looks forward to continued dialogue.

Equality Commission for Northern Ireland



Equality House
7-9 Shaftesbury Square
Belfast
BT2 7DP

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

8 April 2015

Dear Colleague

We welcome the opportunity to respond to your consultation, *A Tenant Participation Strategy for Northern Ireland: 2015 to 2020*.

The Commission views housing as a priority area, as the Department will know from our [response](#) to *Facing the Future: Northern Ireland Housing Strategy 2012-2017* in December 2012, and will be publishing our updated

findings and recommendations in relation to key inequalities in housing in due course.

At this time we would remind the Department of its public sector equality and disability duties and, specifically, of the requirement in Section 75 of the Northern Ireland Act 1998 for designated public authorities such as the Department and housing associations to have due regard to the need to promote equality of opportunity in relation to the nine equality categories and to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion and racial group. The Department's or housing association's equality scheme sets out how it will comply with both of these duties.

Also, Section 49 of the Disability Discrimination Act 1995 requires designated public authorities to have due regard to the need to promote positive attitudes towards disabled persons and to the need to encourage participation by disabled persons in public life ('the disability duties'). This duty is supported by an obligation to have a disability action plan.

We welcome the reference in the draft principles of tenant participation to the need to meet the requirements of equality legislation and Section 75.

We recommend that the draft Strategy also refers to the duties on public authorities in respect of the disability duties as well as the UK Government's obligations under the UN Convention on the Rights of People with Disabilities (UNCRPD). The UNCRPD affords people with disabilities, *inter alia*, rights to full and effective participation and inclusion in society (Article 3), to be consulted with and involved in decisions on legislation and policies (Article 4) and to live independently and be included in the community (Article 19).

We remind the Department that these requirements cannot be delegated. That is, regardless of management or other arrangements, the Department or housing association remains responsible for meeting the equality and disability duties. This is set out in [Equality of Opportunity and Sustainable Development in Public Sector Procurement](#) (2008) (ECNI and DFP).

More information and guidance on meeting the requirements of the equality and disability duties can be found on the Commission's website at www.equalityni.org or by contacting the Commission.

Yours faithfully

Deborah Howe

Stakeholder Communications Manager

dhowe@equalityni.org

Falls Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords
(With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods in itself is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in determining positive consistent communities. It is relatively easy to demonstrate how you achieved tenant

participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons,

This could offer other avenues of community development via environmental and physical regeneration. However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.
- Learning from historical knowledge as what works best in an area (in design terms).

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- Taking learning from NIHE in relation to design and participation with tenants, such as in the area of the 'on the ground' and accessible maintenance officers.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes

Please provide you reasons

Name of Respondent _____ Roden Street Tenants & Residents Group
E-mail contact _____ rscdg@hotmail.co.uk

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other
Owner occupiers

Please provide Organisation Name: Falls Residents Association

Glencolin Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

✓ By ensuring specific tenant participation strategies are developed by Social Landlords
(With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes ✓ No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods in itself is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in determining positive consistent communities. It is relatively easy to demonstrate how you achieved tenant

participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons,

This could offer other avenues of community development via environmental and physical regeneration. However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.
- Learning from historical knowledge as what works best in an area (in design terms).
- Taking learning from NIHE in relation to design and participation with tenants, such as in the area of the 'on the ground' and accessible maintenance officers.

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Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes ✓

Please provide you reasons

Name of Respondent Glencolin Residents Association

E-mail contact; jbunting8@yahoo.co.uk

Please specify if you are:

NIHE Tenant

Housing Association Tenant ✓

Other ✓
Owner occupiers

Please provide Organisation Name: Glencolin Residents Association

Helm HA tenants forum

Consultation Question No. 1:

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

- **By ensuring specific tenant participation strategies are delivered by Social Landlords**
- **By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways**

Tenants at Helm Housing feel that a tenant participation strategy is an essential and effective method to increase the extent and effectiveness of tenant participation in Northern Ireland. A common view by tenants is that “Having policies in place is a way to ensure that tenants have a voice in tenant involvement”. Tenants feel a strategy demonstrates the importance of a two way process for both tenants and landlords. It also highlights to tenants the level of commitment by Helm Housing and the importance of demonstrating that the strategy is not a “tick box exercise” for social landlords.

Consultation Question No. 2:

Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

An overwhelming majority of tenants feel that the expectations of the strategic approach to tenant participation are appropriate and fair. There is an agreement amongst tenants in Helm Housing that the ten principles for Tenant Participation outlined in the Tenant Participation Strategy aim to achieve the promotion and encouragement of meaningful participation in the social housing sector.

Consultation Question No. 3:

Do you agree that the Department should support the development of an independent support organisation in Northern Ireland?

Tenants strongly support the development of an independent support organisation in Northern Ireland. This is a vital element of Tenant participation and enables tenants to develop a culture of mutual trust and respect at all levels i.e tenants, board and staff. An independent support organisation would allow for open, clear and accountable decision making. Supporting Communities NI (SCNI) have been supporting Helm Housing Association in reviewing their Tenant Engagement Structures and Governance arrangements and tenants welcome their involvement in developing tenant involvement and engagement within the organisation.

Consultation Question No. 4:

Is the regulatory standard clear and understandable?

The majority of tenants felt that that this matter was unclear. They felt the language used in relation to regulatory standards in the consultation document were complex and difficult to understand. Tenants would have liked more tenant friendly question and reference to tenant involvement.

Consultation Question No. 5:

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – right to manage, right to transfer or community cashback scheme?

A strong case was evident in relation to the view that whilst tenants support tenant empowerment they do not believe that legislation should be introduced particularly in relation to support the introduction of right to transfer. Tenants felt apprehensive about transferring stock from Housing Executive to Housing Association. Nevertheless, tenants strongly support greater involvement in their local community and would envisage some tenants in the future having the right to manage such as in managing gardening contracts. It was highlighted that tenants have different levels of skills and expertise and with the support of SCNI the Tenant Participation Strategy would enable development of new skills/training to community/resident groups.

Consultation Question No. 6:

Do you agree with the findings in the Impact Assessment screening report?

Similar to Question 4, tenants felt this question was unclear and too complex to comment. However, after some further clarification on this matter, it was felt that there was no need to do a full impact assessment.

Helm Housing

April 2015

Housing Rights Service



POLICY RESPONSE

www.housingrights.org.uk

@HousingRightsNI

**Response to a Consultation Document
on a Tenant Participation Strategy for
Northern Ireland: 2015 to 2020**

April 2015

1

1.0 Introduction

Housing Rights Service (HRS) welcomes the opportunity to respond to the Department for Social Development's (the Department) consultation on *A Tenant Participation Strategy for Northern Ireland: 2015-2020*. We are pleased that the Department considers tenant participation as an integral part of the successful delivery of social housing and its ensuing services.

Tenant involvement is defined by the Chartered Institute of Housing (CIH) as *"a two way process involving sharing information and ideas where residents are able to influence decisions and take part in what is happening"*. HRS supports the view that greater user involvement in landlord services leads to a more customer-focused approach being adopted; making services more efficient and raising quality.

Research from the Audit Commission establishes a clear link between user involvement and improvements in services, *"The benefits of resident involvement can be considerable. Our research established clear evidence of benefits, to the business, to residents and to the wider community. Specific gains for housing organisations include an impact on performance, better services and enhanced accountability."* Their report goes on to say, *"These improvements are also important to residents, but involvement can benefit residents in additional ways: such as individual capacity building and improved local community involvement. The latter can have a wider reaching impact in terms of stabilising communities and helping to ensure their sustainability"*.¹

It is worth noting at the outset that the onus is on the social landlord to effectively engage with their tenants and other service users. It is the landlord who comes from a stronger power base and is well resourced. There is an expectation, therefore, that the landlord will make the effort to proactively encourage tenant and user participation.

2.0 Summary of key points

HRS believes that, in principle, the advancement of tenant and user participation is to be welcomed. There are a number of key points that we would like to highlight at the outset, which are developed further in this response:

¹ *'Improving services through resident involvement'*, Audit Commission and the Housing Corporation, 2004.

- HRS recommends that the Government should proactively monitor, through the regulatory process, the progress made in engaging with tenants and other users. If suitable progress is not demonstrated, the Department should give full consideration to developing a legal right to participation at some future stage
- Participation in the development and delivery of social landlord services should be about more than tenants. The Department needs to recognise that the services of social landlords are used by many other people, including the homeless and people on the waiting list for housing. All such service users should have a say in the workings of landlords. This is not only good for the end user, but can also lead to better services being offered.
- Particular attention needs to be paid to the 'easy to ignore' groups. This will entail landlords making extra efforts to reach these groups. Whilst we welcome the 10 Principles for tenant participation, we would ask the Department to consider strengthening them to expressly make reference to easy to ignore groups. We believe that although Principle 10 refers to *'the requirements of legislation on equality and Section 75'*, the easy to ignore groups could be overlooked if not more explicitly referred to in the Principles. Successful engagement with easy to ignore groups is key to effective participation, and this addition to the Principles would help to reflect this.
- Landlords and service users will need support and training in order for them to engage effectively. This will require additional investment of resources.
- Regulation needs to be proactive at least in the initial 5 year period. There also needs to be appropriate sanctions put in place for non-compliance. However, we understand that there needs to be a balance between supporting landlords and sanctioning them.
- There needs to be greater clarity and detail on the proposal for regulation of the participation activity. HRS believes it should extend to all social landlords and not just to Housing Associations.
- We support the idea of a Tenants' Advocate but believe more consideration needs to be given to their role and remit. Their paramount concern must be the needs and interests of their particular client group.
- Tenant empowerment seems to be the next logical step. An appropriate level of skills, support and knowledge will be required to equip tenants to appreciate the significant responsibilities which come with exercising these rights.
- The social inclusion impact assessment should be reviewed to specifically look at the potential impact the strategy, as currently drafted, has on homeless persons. Homeless persons are valuable consumers of social landlord services and, there is a need to ensure that appropriate mechanisms are in place to ensure they are not disadvantaged by an exclusive focus on the needs and preference of existing tenants.

3.0 Legal right to participate

In Northern Ireland, the Northern Ireland Housing Executive (NIHE) has a statutory duty to consult its tenants on matters affecting their tenancies.² The NIHE has developed this statutory duty into encouraging a more active and participative involvement of tenants and residents groups in the delivery of their services through the operation of the Housing Community Network. NIHE has made clear commitments to “...working with tenants, residents and other users in order to ensure improvements to the neighbourhoods that we work in.”³ For Registered Housing Associations, the existing regulatory code of the Department requires that they “must seek and be responsive to residents’ views and priorities”.

Under the current proposals, the Department plans for tenant participation to sit as part of an overall regulatory standard. However, in some other jurisdictions respective governments have gone beyond this and enshrined a right to participate in legislation. For example, in Scotland, a right for tenants to participate is enshrined in law under the Housing (Scotland) Act 2001. The right to participate applies to all social tenants, regardless of who their social landlord is.

Although no such legal right is currently being proposed in NI, we believe that the option of developing a legal right to participate should be considered by the Department. HRS recognises the lengthy period which is required to introduce a new piece of legislation and would not wish to see progress on promoting tenant participation unnecessarily delayed pending the introduction of a legislative right.

HRS recommends that the Government should proactively monitor, through the regulatory process, the progress made in engaging with tenants and other users. If suitable progress is not demonstrated, the Department should give full consideration to developing a legal right at some future stage, (possibly timetabled to coincide with the future review of the Tenant Participation Strategy).

In the absence of a statutory right to participation, it is essential that co-production of services between the service user and the social landlord is at the core of any service delivery. Co-production in this context means using the combined lived experiences of users and the expertise of landlords to create better services. Effective co-production will require support and resources for all parties involved to be able to fully play their part and may, in some cases, require a significant culture change amongst the social housing providers

² Article 40 of the Housing (NI) Order 1983

³ ‘Community Involvement Strategy 2014 – 2017’, NIHE, September 2014

4.0 Who should be able to participate?

We believe that the consultation document is ambiguous in terms of who should be involved in the participation process. On the face of it, it appears to be restricted to only encouraging participation from the 'tenants' of social landlords; although there is some limited reference made to 'other customers'. HRS would welcome greater clarification on this as we believe it is important to extend participation to all consumers of social housing services. It would therefore be helpful if the Department could provide a definition of who is included in the reference to 'other customers'. For example, is it 'customers' as referred to by the NIHE i.e. "...broad customer base comprises anyone with a stake in neighbourhoods, including Housing Executive and private tenants, owner occupiers and leaseholders"?⁴

The following groups are just some of those who use the services of social housing providers and who, therefore, should be involved in the co-production of those services on a day-to-day and on a strategic basis:

- Current tenants,
- Homeless people,
- People who are on the waiting list for social housing, and
- People who are receiving housing support services provided by the landlord such as home owners who pay the landlord for services e.g. in mixed tenure buildings and travellers who use sites provided by the landlord.

We believe that the Department should consider the Scottish Housing Charter (the Charter) as the model for full user participation.⁵ The Charter sets out the outcomes and standards that all social housing providers in Scotland should aim to achieve. The Charter is quite clearly aimed at more than just tenants. The Charter's target audience are 'tenants and other customers', such as those mentioned in the list above.⁶ The Charter also stipulates that social landlords are accountable to tenants and other users on how well they perform against the set of outcomes and standards. This helps to promote a culture of transparency amongst social landlords.

Promoting user participation is integral to the delivery of housing services in Scotland. At the outset of their *Consultation and Involvement Strategy 2012-2015*, the Scottish Housing

⁴ Ibid.3

⁵ 2012

⁶ See page 14 of Charter

Regulator states that *“Protecting the interests of tenants and other services users is at the heart of our work. Engaging with tenants and other services users helps to make our work accountable, relevant and transparent”*.⁷ This system clearly acknowledges that non-tenant customers also have an important part to play in developing and delivering good quality, value for money services that people want.

HRS believes the Social Housing Reform Programme (SHRP) presents an ideal opportunity to fully integrate a consumer-based approach to developing and improving social housing services in NI. We believe that this can only truly come to fruition when full user participation is embraced. Full user participation means looking beyond obtaining input from existing social tenants and seeking out the opinions of all users of social housing services. This is particularly important as, in our experience, inherent tensions can exist between those who are already housed and those who are looking for housing.

5.0 Challenges for landlords

HRS recognises that increasing the levels of service user participation will be a challenge for many social landlords in NI. Engaging with only the most organised and vociferous social tenants is likely to be the easiest course of action, but can mean ignoring the voice of a significant number of less articulate service users who are on the periphery. In particular, it may be difficult to reach out to those customers who are not already tenants or to those people who may be regarded as ‘easy to ignore’. This can be as a result of barriers, which landlords and users may not be aware exist, but which need to be overcome in order for such people to participate and for landlords to reach out.

HRS commissioned independent research to further develop understanding of the problems which can be experienced by these groups and how these may be overcome.⁸

Easy to ignore groups can include:

- People who are geographically isolated;
- People with poor communication skills, including literacy and numeracy;
- People with a disability;

⁷ ‘Consultation and Involvement Strategy 2012-2015’, Scottish Housing Regulator, www.scottishhousingregulator.gov.uk

⁸ ‘Involving Everyone: including ‘easy to ignore’ groups in housing policy and strategy development’, Dr Jenny Muir, QUB and Mary McMahon, MMM Consultancy, April 2015. See Appendix 1 for summary of research.

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- Minority ethnic groups whose first language is not English;
- People with mental health issues;
- People with drug and alcohol problems;
- Ex-offenders;
- Children and young people;
- People who are digitally excluded.

Some of the barriers to participation identified by the research are:

- Service providers having an expectation that service users will fit into their existing structures and ways of working,
- Staff not having the right knowledge or skills,
- Limited information being provided and not in an appropriate format'
- Lack of physical access for attending events,
- Negative attitudes towards service users,
- Practical needs of users not being taken into account e.g. transport costs and timing of meetings.

Equally important to involving users, is ensuring that the right structures are put in place to allow users to know that their contributions are being listened to and are of value. The methods employed in capturing those contributions must be flexible enough to cover a wide range of users; taking into account their varying backgrounds, needs and abilities. Failing to adapt to different users' needs and priorities could have the paradoxical outcome of stifling participation. The Department should, therefore, be wary of allowing social landlords to adopt a 'one size fits all' approach to participation.

Genuinely engaging with users will involve, amongst other things:

- Creating techniques to make the voices of the easy to ignore into valued opinions;
- 'Really listening' to what users are saying. In some cases this may involve taking more time with particular users, for example those who need an interpreter or those who depend on a carer to speak on their behalf;
- Communicating with users in small group discussions;
- Making information easily accessible;
- Properly trained staff who can actively engage with users and identify their input at a policy and strategic level;
- Making special provisions to have users physically present at discussions e.g. providing transport to meeting venues;

- Where feasible, making appropriate technology available to users to actively participate;
- Having access to and being able to contribute to a Centre of Excellence on good practice.

Appendix 1 of this response includes a detailed summary of the research and includes a number of recommendations on how these barriers may be addressed. HRS hopes this will be helpful to both the Department and social landlords.

6.0 Support

The effective implementation of a participation strategy will require sufficient resources and investment to be made available to support not just users in developing their participation skills, but also social landlords in developing their participation techniques and in designing and fulfilling their own strategy. We are encouraged that the consultation document states that the Department *“will make a strong case for government funds to support this”*. It is, however, not in our view unreasonable to expect social landlords to pay a levy which could help fund this essential work. Ultimately, from a business perspective, it is in the long-term interests of social landlords to invest in service user participation. There is a clear link between involving service users and enhancing and improving the services provided.

In NI, there are wide variations in the experiences and capacities of social landlords to carry out greater user participation. Again, just like with the end user, a ‘one size fits all’ model will not be the best approach in working with social landlords. Some social landlords, such as the NIHE, already have a wealth of experience of engaging with users in developing their services through their Housing Community Forum Central Panel. They have also already made a commitment in their Community Involvement Strategy to give *“...residents a real say in making their neighbourhoods good places in which to live and help build stronger communities. The broad customer base comprises anyone with a stake in neighbourhoods, including Housing Executive and private tenants, owner occupiers and leaseholders.”*⁹

Unfortunately, not all social landlords are at the same stage in involving users. The greatest variation in practising user participation occurs within the Registered Housing Association movement. In our experience, there is currently no consistent approach to user participation amongst the Housing Association movement. Many Housing Associations have

⁹ Ibid.3

little or no experience of engaging with users on the level required by the proposed standards. User participation will be uncharted territory for many Housing Associations.

Initially, there needs to be a focus on individual Housing Associations developing and implementing their participation strategy to meet the agreed standards. In many cases, extensive support and training will be needed to ensure not only that their user participation strategy is published, but also that it is put into everyday practice and fully complied with. This support and training will be needed throughout all levels of the organisation; from the Board and Senior Management teams right down to the frontline staff.

Social landlords will need to be supported and 'skilled up' to communicate in the right way with their service users. Special skills and techniques may be needed to fully engage with some particular groups of users, especially those who are 'easy to ignore'.

We believe that the Department should build on the skills and knowledge that already exist in Northern Ireland. Supporting Communities NI (SCNI) provides expertise in supporting and developing tenant participation. Most of their work to date has been with developing the skills and input of NIHE tenants, but they have also begun to branch out into working with Housing Association tenants. SCNI *"promotes best practice in Community Participation in Northern Ireland through a 'grassroots' approach to Community Development, providing tailored support, advice, information and training to new and existing Community Groups, Statutory and Voluntary Organisations."*¹⁰ SCNI does this through a network of Community Liaison Officers who work with tenants in acquiring the right skills and knowledge. As such, they are ideally placed to continue to carry out this function. Additional and appropriate resources will need to be allocated to ensure that this essential work can be undertaken.

6.1 Establishing a Centre of Excellence

Given the significant task ahead for landlords and service users, we believe that consideration should be given to developing a local *Centre of Excellence for User Involvement in Housing Services* (Centre of Excellence). In the research recently commissioned by HRS, it is recommended that the skills, knowledge and experience that already exists in NI and beyond should be harnessed and brought together so as to make resources and support more easily accessible.¹¹ There are already many organisations in NI, and beyond, who can show good practice in user participation. However, these examples of

¹⁰ <http://www.supportingcommunitiesni.org/Default.aspx>

¹¹ *ibid.*8

good practice cannot currently be centrally accessed; meaning that many of them remain unknown to the very people and organisations that could potentially be able to benefit from their work and experience.

The research envisaged the Centre of Excellence as being a small independent resource base with service users at its core. In times of limited public funding, it could potentially be funded by a combination of the following:

- Government funding, including European money;
- Philanthropic sources such as charitable trusts;
- Funding from social landlords and possibly private landlords; and
- Private sector donations and sponsorship.

According to the research, the Centre of Excellence could have the following functions:

- Development of a knowledge base and good practice repository from the UK and internationally.
- Provision of training, conference and seminars in order to disseminate and share examples of good practice.
- Administer an Innovative Involvement Programme to allow service providers the opportunity to experiment with methods of user participation
- Carry out quality assurance reviews for landlords on a consultancy basis.
- Advise the public, voluntary, community and private sector on good practice.
- Maintain a register of skilled practitioners in engagement techniques.
- Devise performance measures for evaluating participation.
- Commission or co-ordinate a longitudinal study (at least a 10 year period) on the wider impact of participation on individuals and communities.

HRS would encourage the Department to explore this idea further and to engage with key stakeholders, including HRS, in any discussions.

7.0 Regulation and scrutiny

Regulation is an intrinsic element of the proposed Participation Strategy. The standards set out will be governed by legislation and will be subject to the scrutiny of a Regulator. We agree that any standards to be met by social landlords should be subject to inspection. It is only by examining how landlords meet the standards that a proper analysis of their

competencies can be carried out. It is important that service users are consulted with at all stages; from developing a Participation Strategy, right through to scrutinizing it.

Although the question of who will take up the role of Regulator will be the subject of another consultation exercise, we believe there is real benefit in having an independent Regulator who is free from possible Government constraints and conflicts of interest (either perceived or real). Independence brings with it user confidence and trust when carrying out its work and reaching its findings.

- We believe that the wording of the regulatory standard, as currently proposed, is ambiguous and that further clarification as to who the standard applies is required. The consultation document only refers to 'Associations'. We would like clarification on whether the NIHE (or its successor) will be subject to the same Regulatory Standard.
- We believe that the assessment of the Regulatory Standard has to be proactive. There is a current trend, reflected in the recently released *"Proposals for a New Regulatory Framework for Social Housing Providers in NI"* which is moving away from a compliance based to a risk based approach to regulation. However, we do not believe this risk based approach would be appropriate in relation to a new activity such as service user participation. Any regulation of the Standard should, in our view, be proactive at least until the Strategy is reviewed.
- Regulation should involve tenants and other users. From the consultation document, it is not clear the role, if any, which tenants/users would have in the regulatory process.

In the case of Scotland, all service users are involved in the regulation of social landlords. There is provision for service users to give feedback on their landlord's performance. This is then collated and published on an online comparison tool which enables service users and social landlords to compare social landlords' performances against each other.¹² The Scottish Housing Regulator sees this as a core element of improving standards in social housing as it allows social landlords to benchmark their performance with their peers. This has the knock-on effect of improving standards and also empowers service users to engage with their social landlord.

¹² Comparison tool can be found at <http://www.scottishhousingregulator.gov.uk/find-and-compare-landlords>

The Scottish Housing Regulator has just published its first *National Report on the Scottish Social Housing Charter*.¹³ Their main findings show that the things most closely associated with overall satisfaction are:

- Landlords keeping tenants informed about their services and decisions;
- The quality of tenants' homes;
- Good neighbourhood management;
- Having opportunities to participate;
- The time taken to complete non-emergency repairs; and
- The quality of repairs and maintenance to tenants' homes.

These findings quite clearly illustrate that service user participation and open communication with social landlords are high on the agenda of service users and adds greatly to the satisfaction that they have with their home, their neighbourhood and their landlord.

- Finally, we believe that there is a need for the Department to clarify what action will be carried out if a landlord fails to comply with the Standard. Achieving progress in this area will be dependent on finding an appropriate balance between providing support and encouragement and the threat of sanctions if a landlord does not comply. It is not appropriate in our view, for the Department to only step in when there is a demonstrated case of serious failure (as is currently the situation in England). Given that NI is at a formative stage in designing the process, there is an opportunity for the Department to achieve the right balance.

7.1 Tenants' advocate

HRS welcomes, in principle, the concept of a 'Tenants' Advocate'. There are many good examples of services that have been established to represent the needs and concerns of particular interest groups. These include:

NICCY - The role of the Northern Ireland Commissioner for Children and Young People is to safeguard and promote the rights and best interests of children and young people.¹⁴
The Commissioner is constituted to:

¹³ An analysis of landlords' 2013/14 annual returns, March 2015

¹⁴ <http://www.niccy.org/>

- Undertake general inquiries into issues where she believes children are being adversely affected.
- Respond to requests from the Assembly and Parliament to look at issues.
- Review the ways that those providing services for children listen to complaints and take account of children's views.
- Deal with individual complaints from children and young people, or their parents/guardians about government services.
- Start or take over legal proceedings on behalf of a child or young person if a general principle is at stake.
- Develop ways of communicating with young people and encouraging their participation in decisions.

COPNI - the Commissioner for Older Persons in NI is "*an independent champion for older people, who safeguards and promotes their interests.*"¹⁵ The Commissioner's principle aim is to safeguard and promote the interests of older people. Although established under the Commissioner for Older People Act (NI) 2011 and sponsored by the Office of the First Minister and Deputy First Minister, the Commissioner is independent of Government. The Commissioner's powers include:

- Raising awareness of the interests of older people.
- Reviewing the law as it affects the interests of older people.
- Reviewing the adequacy and effectiveness of services provided to older people by "relevant authorities".
- Encouraging best practice in the treatment of older people.
- Encouraging participation by older people in public life.

In both of these examples, and in many others, the 'advocate' has a sole duty of acting on behalf of and in the best interests of their user base. They may have been set up by Government; but, crucially, they are independent of Government and their paramount responsibility is to promote the interests of their particular client group.

It is not clear in the consultation document the remit or indeed the status of the 'Tenants' Advocate' which is being proposed. The following detail would be required to enable the value, or otherwise, of this proposal to be assessed. For example:

- How will the Tenants' Advocate be selected?
- What is their terms of reference?

¹⁵ <http://www.copni.org/about-copni.html>

- What will their relationship be with Government/social landlords?
- How will their effectiveness be monitored?
- Who will they be accountable to?

HRS would encourage the Department to explore the Tenants' Advocate proposals with key stakeholders, including ourselves, to further develop this idea.

8.0 Tenant rights

The Department rightly considers tenant empowerment as a logical next step on from service user participation. Empowerment can include the right of tenants to:

- Manage their own properties;
- Transfer to a different social landlord; and
- Have access to community cashback schemes.

These rights already exist in other parts of the UK. HRS supports the development of additional tenants' rights. However, we would add a note of caution. We believe that the idea of tenant participation is already a huge leap in the mindset of many tenants and landlords. As already mentioned in this response, much work will need to be carried out at both a tenant and landlord level to get all parties to a point where they can effectively engage with each other in developing and delivery quality services. This will require the investment of much time and resources.

Tenant empowerment goes above and beyond participation and is of benefit when tenants have the capacity not only to participate, but also to appreciate the responsibilities that they have in exercising such rights. The ability to meet those responsibilities will depend to a large extent on the support and training that tenants will receive.

9.0 Impact assessment

In drawing up their consultation document, the Department has carried out a series of impact assessments. The Department did not identify any adverse impacts. However, in our view, the consultation proposals, as they are currently formulated, could have an adverse impact on homeless people. Homeless people are recognised as one of the most marginalised and socially excluded groups in our society and they are also important consumers of social housing. There are often tensions between their needs and the preferences of those people who are already tenants.

HRS believes greater consideration must be given to how their interests will be represented and safeguarded. We would, therefore, ask the Department to review its social inclusion impact assessment and, in particular, to ensure appropriate mechanisms are contained within the Strategy to ensure that homeless people are not disadvantaged as an unintended consequence of the implementation of the proposals contained in the document.

10.0 Conclusion

This response represents the views of HRS. However, as part of the process of making this submission we have drawn from the valuable feedback made by a range of stakeholders at the ‘Shaping Social Housing’ conference. There was a general consensus amongst participants that user participation was to be welcomed. However, many of them shared the same concerns and had the same calls for clarification as we have indicated in this response. Full details of all feedback from the conference can be found in Appendix 2.

We have also referred to the research recently commissioned by HRS which looks at involving easy to ignore groups and the barriers that currently exist to their participation. We feel that for participation to be truly effective it needs to include all service users; with particular effort and resources being made available to reaching out to the easy to ignore groups.

HRS would be happy to contribute to any future discussions which the Department may undertake regarding user participation.

We will be pleased to provide additional information in support of this response. For further information contact:

Sharon Geary
Policy Officer
Email: sharon@housingrights.org.uk
Tel: 028 9024 5640

New Barnsley Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

Develop Forums similar to the case studies in Scotland etc, NIHE & Social Housing Community Networks where Tenants can be involved whether as an individual or in a residents/tenants group on a genuine joint partnership and equal basis to insure there is “housing structures that support the provision of social and affordable homes, in thriving communities where people are proud to live”.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

Yes

No

Please explain

Build on good practice already in place i.e. NIHE Housing Community Networks compacts and develop policies that Landlords can sign up to with regard the three points to foster greater participation and the social landlord’s strategy for tenant participation should reflect the *10 principles for tenant participation* included in the DSD Document.

- Develop and deliver a strategy for tenant participation;
- Have due regard for the information contained in this strategy, particularly the standards set out in Appendix B, when developing or reviewing their own strategy;
- Ensure that tenants and other users are made aware of and are clear about the participation activities and strategic approach to tenant participation.

The important thing is that tenants and other users are made aware of opportunities for participation and encouraged to participate. Tenants should find it easy to access information.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

This development would need “minimal change” in that Housing Associations start to work closely with community, tenants through NIHE & DSD structures and policies. The Department should further consider strengthening and developing the NIHE tenant support mechanisms already in place but also involving through new policy the support and participation of Housing Development Associations’ in genuine working partnerships with tenants and the community similar to those set up by

NIHE and that NIHE act as the tenant participation advisory service under the Housing Community Network similar to TPAS supported by and accountable to the DSD and local government. As stated within the document The Housing Executive has involved residents and local community associations in discussing and developing local services and addressing housing issues for many years has a wide network of community groups and has an established Housing Community Network which has different tiers of involvement which meets monthly. The network has evolved and the new community inclusion strategy has tenants involved in area scrutiny panels, inter-agency partnerships and working with difficult to reach groups. All policy changes are discussed and consulted at central forum. The Tenant, community and NIHE

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons

Empowering residents builds and maintains strong and cohesive estates, tenants should be consulted and given opportunities to develop joint policies and proposals with Housing Associations’ and landlords over any change in policy, i.e. Tenant contracts under any new tenant should include 6months probationary period monitoring lasting for at least 2years in relation to possible anti-social or criminal issues, although given that the waiting lists are still increasing and there is still so much demand from

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applicants there should be a policy on looking at equal numbers of Transfers within each new housing development to get better use of NIHE and Housing Associations Housing Stock.

Good practice examples should be funded and supported within supporting tenant empowerment such as parks and gardens projects, community activities and tenant initiatives including young advisors and leader’s programmes, outreach service for vulnerable residents, fun days and events, community safety, focus groups, surveys, housing surgeries.

Concern is expressed over awareness of the cost of providing accommodation to meet demand in terms of those under-occupying and existing applicants on the Waiting list; There needs to be agreement that one-bed properties should not be added to any new social housing programme – this is seen as going against the work that has been done across the city to build sustainable communities; Flats in particular are seen as contributing to ASB and social isolation; There will be ongoing need for family accommodation, as families appear back on the Waiting List following repossessions – want to avoid creating undesirable accommodation; One-bed accommodation does not fit with housing association construction to Lifetime Homes standard. Any possibility of loss of Direct Payment to landlords, suggesting that rent would be last of tenants’ priorities when monthly budgeting. Direct Payment is seen as an important ‘safeguard’ for those on benefits, so that they do not need to budget monthly for rent. This is especially applicable given the considerable housing of vulnerable people by NIHE and Housing Associations’; advice should be available for vulnerable people.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes No

Please provide you reasons

Name of Respondent Jacqueline Hamilton

E-mail contact jacqueline.hamilton@usdt.co.uk

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: Newbarnsley Residents Associations

NIHE Disability Forum

**The Northern Ireland Housing Executive Disability
Forum response to the DSD**

**‘A Tenant Participation Strategy for Northern Ireland:
2015 – 2020 Consultation’**

April 2015

The Northern Ireland Housing Executive Disability Forum

The Disability Forum was established in 2011 by the Northern Ireland Housing Executive (NIHE) to ensure that disability is represented at all levels within the organisation. The Forum, as a user led group, increases the number of people with disabilities involved in the existing district, regional and central Housing Community Networks (HCNs) across Northern Ireland.

The Disability Forum enhances, complements and contributes to NIHE structures by providing a two-tier platform in which disability issues can be addressed formally whilst allowing members to feed into their respective HCN's.

The Forum provides pan-disability user representation covering visual, hearing, physical, learning, hidden, mental health or multiple disabilities and focuses specifically on the housing issues which affect people with disabilities.

Introduction

The following is the NIHE Disability Forum's comments/ recommendations, in relation this important consultation on the DSD Tenant Participation Strategy, gathered at consultation event held on 25 March 2015 in Disability Action, Belfast.

In the interests of transparency, accountability and plain language the Forum's comments are reported, for ease of reference, in plain language and the text is as true to the spoken word as possible.

General Comments

Question 1; How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation?

- Recommend a specific Tenant Strategy for consistency and transparency and to hold Social Landlords to account, in particular, to provide evidence of compliance to the regulator.
- Would ask the rationale as to why the new regulatory standard for Tenant Participation will apply in a different way to NIHE. (See page 24 of document.)

Question 2; Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

- Yes, as a strategic approach requires standards set to achieve a level playing field for all Social Landlords.
- Cognizance must be taken of barriers faced by different communities to ensure that all nine s75 listed groups are covered within the strategy e.g. rural and disability communities.

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- Are other types of housing covered e.g. Leonard Cheshire or Housing Folds?
- The standards are already there. The NIHE do tenant participation really well including partnerships with Supporting Communities NI and the NIHE Disability Forum – no need to reinvent the wheel.
- Housing Associations in general do not have a good history of participation nor is there consistency of approach. They would have to be brought up to NIHE standard. Who would fund this?
- Rural issues are different from urban issues e.g. accessible transport to attend meetings.
- Why is the private sector not included within this document? Are there future plans to include them?
- There is no reference to children issues, in particular, children and young people with disabilities and children living in poverty.
- As well as s75 any strategic approach must be underpinned by relevant legislation e.g. DDA 1995 and UN Convention of the Rights of Persons with Disabilities.

Question 3; Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

- First define 'support' - this needs to be more explicit to enable informed comment.
- Is it similar to the NIHE and Disability Action's support to the Disability Forum?
- Define an independent organisation. Should there be more than one? There is already an independent mechanism in place. The current structures within NIHE, SCNI and various Fora work well e.g. Disability Forum.
- How will the power balance between tenants and an independent organisation be addressed?
- Support is also required along with guidance.
- How will this support be funded – without adequate resource allocation this vision will not be achieved?
- All of the above must be consulted on.

Question 4: Is the regulatory standard clear and understandable?

- Regulatory standard is required to ensure consistency and a level playing field for all stakeholders.
- Any framework must be flexible to adapt to changing circumstances e.g. impact of Welfare Reform.
- Regulatory standard should be review before 2020. It should be reviewed in stages and this must be specifically written into the regulations.

Question 5: Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights? (i.e. right to manage to transfer or community cash back scheme?)

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- Unsure if Northern Ireland is ready for this change. As far as I am aware in England $\frac{3}{4}$ of funding for the Community Cash Back Initiative was handed back.
- Regarding Housing Transfer when a NIHE tenant transfers to Housing Association any debt does not transfer with them which means a loss to the public purse.
- Some Stock Transfers have resulted in good refurbishment projects that wouldn't have happened with NIHE tenancy.
- This requires ongoing debate and consultation as it is usually NIHE to Housing Associations in Stock Transfers.
- For some tenants a housing transfer can create difficulties and fears especially for people who do not like change.
- Also fear that rent rate will increase.
- Housing Associations do not speak to other service delivery agencies e.g. Health Trusts. Joint working practices must be developed e.g. life expectancy issues – as people get older require more adaptations to their homes.
- Unsure of how DSD will lead on the tenant empowerment rights as they do not have the experience of NIHE.
- What about people with disabilities living in the five Health Trust's accommodation which managed independent living? Where do they fit in under this legislation? Who receives their housing benefit – individual or Trust?
- The legislation cannot go ahead in isolation again when will private landlords be included? There are so few NIHE homes that people are forced to rent from the private sector. This will continue as people cannot afford to buy their own homes and because people are living longer.
- Recommend specific consultation on the legislation as it is developed.
- Recommend that footnote 12 Page 25 be written into main document in the interests of clarity.

DSD Commitments Page 26

- The establishment of an independent advocate requires consultation on who is the best person(s) to take on this role.
- The Disability Forum believes that people with disabilities can advocate on behalf of themselves and it is their voice that should be heard.
- How would all the 9 groups listed under s75 be fully represented? How would one person understand all tenant issues?
- Would an advocacy panel be best placed to do this? Such a panel must be representative of all s75 groups.
- This issue requires specific consultation with all s75 groups and their representative organisations.

Question 6: Do you agree with the findings in the Impact Assessment screening reports?

- Screening assessment should have been carried out after this consultation so that information gathered could have informed the Strategy.

- This evidence gathering cannot be done in isolation. Has the Department held specific consultations with the other relevant stakeholders eg DHSSPS, 5 Trusts, Community and Voluntary sector?

The NIHE Disability Forum strongly believes that the voice of disabled people must be heard at the development stage of any given policy and therefore welcomes the opportunity to feed into this important consultation and looks forward to ongoing engagement as decisions and policies emanating from the Housing Reform Programme are developed and implemented.

Contact Details

Disability Action provides the secretariat and facilitates all the meetings of the NIHE Disability Forum. For further information contact:

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Northern Ireland Association for the Care & Resettlement of Offenders (NIACRO)



**NIACRO response to:
A Tenant Participation Strategy for
Northern Ireland 2015 - 2020**

Date: 08/04/2015

PACT: 2015/01

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Original Consultation Responses in full

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

8th April 2015

Dear Sir/Madam,

Thank you for the opportunity to respond to the consultation on A Tenant Participation Strategy for Northern Ireland 2015 – 2020.

NIACRO is a voluntary organisation which has been working for more than 40 years to reduce crime and its impact on people and communities. NIACRO provides services for and works with children and young people, adults in the community, and people in prison and their families, whilst working to influence others and apply our resources effectively.

We receive funding from, and work in partnership with, a range of statutory departments and agencies in Northern Ireland, including criminal justice, health, social services, housing and others.

Our comments are based on our direct experience of delivering services to children and young people who are at risk of offending, people in prison and their families, and adults in the community, as well the feedback we gather from our service users.

We welcome the opportunity to respond to the consultation and would be happy to provide further information if that would be helpful.

We look forward to receiving the final document.

Yours sincerely

Pat Conway

Director of Services

NIACRO response to A Tenant Participation Strategy for Northern Ireland 2015 - 2020

Introduction

1. The NIACRO Assisting People and Communities (APAC) Floating Support project has been in operation since October 2005 and is funded by Supporting People through the Northern Ireland Housing Executive (NIHE). The project works with people who have been involved in anti-social or offending behaviour and is supported by the NIHE Community Cohesion and Safety Unit as part of its approach to dealing with people at risk of losing their tenancy because of their behaviour. In 2014, the project was extended to provide floating support for people whose tenancy is at risk due to harassment or intimidation because of their ethnicity (STEM).
2. This work in the community is supported by NIACRO's Base 2 project, which aims to provide a crisis intervention, clarification and support service for individuals and families who may be at risk of violence or exclusion in the community. The service has been operating for more than 25 years and offers: verification of threat; conflict mediation; advice and support; assistance, if necessary, with re-location out of the area of threat; and referral to NIACRO or other services where appropriate. The project is currently resourced by the NIHE Homelessness Unit and supports integration by helping to prevent exclusion and homelessness, including amongst people who offend and their families.
3. This policy response is informed by the views and experiences of our staff and service users delivering these projects.

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

X: By ensuring specific tenant participation strategies are developed by Social Landlords

___; By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons:

We recognise that in Northern Ireland, there has been a significant level of engagement with tenants, particularly by the NI Housing Executive and through Supporting Communities (NI) organisation which promotes best practice in community participation. Housing Associations are already required to:

1. consult tenants on issues affecting their tenancies;
2. have a complaints procedure in place; and
3. survey tenants every year.

In our experience, the level of engagement with tenants can vary significantly. We recommend that in order to work towards achieving consistent levels of engagement, Housing Associations should be required to

produce a strategy for tenant participation. This will help tenants and regulatory authorities hold Social Landlords to account. In addition, Social Landlords should expect to produce evidence that they have been implementing the strategy and have made every effort to achieve the standards.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes

No

We agree that the ten principles for Tenant Participation outlined in the consultation paper are reasonable and appropriate. Sharing information can be challenging in communities which include people from ethnic minority backgrounds who may have difficulty speaking English or tenants with particular disabilities, and these barriers must be considered. It is NIACRO's experience that many of the tenants we work with have poor levels of literacy and limited experience of participation in society generally, yet it is important that their needs are addressed so this too must be considered in a participation strategy. In addition, facilitating participation in rural areas will require tailored approaches, depending on the location and the size of the area. Making sure all people have enough time to consider the issues being raised is therefore critical and we recommend potential obstacles to participation are addressed in advance..

As it will be difficult to be prescriptive about how these principles are applied across different communities and circumstances, it is essential that the Landlord organisations can put forward the evidence that they have made every reasonable effort to adhere to them.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes

No

NIACRO has a wealth of experience of working in communities dealing with the causes and impact of crime and anti-social behaviour, and encouraging communication with statutory bodies. We know that the chance to participate in training can really make it possible for some people to come forward and engage. It is essential to have an independent party to guide people and be available to give practical help and advice. We therefore support the proposal to have an independent body to support tenant participation and take responsibility for providing feedback.

We also recommend that the experience of working with communities in Northern Ireland, such as that of Supporting Communities NI, should be a key criteria in the selection of such a body, and would assist the process of standardising good practice across social landlords.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes

No

If not, what more would you include?

The Regulatory Standard outlines key duties for landlords: how they gather and take account of the views and priorities of their tenants; how they can shape their services to reflect these views; and how they can help tenants become involved.

It is important to ensure that this is monitored properly as there is a risk that Landlords' might only 'go through the motions', doing the minimum necessary to evidence compliance with the Standard, but fail to achieve proper engagement with tenants. Liaison with tenants will require consistent effort and monitoring must take this into account.

There is also a risk that whilst a number of tenants might step forward to participate in a forum, their views would not represent the wider community. We recommend that Landlords are obliged to ensure that there are a number of ways that tenants can make their views known, and also that any discussions with tenants groups are communicated to the wider community.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Tenant empowerment seems like a natural progression from effective participation. There are positive examples in places like Glasgow and elsewhere, where groups of tenants in a community became involved in lobbying to influence how their neighbourhood was developed to ensure that the community remained intact through development, and the heart of the community was strengthened in the process. The experience of living in such a community is in itself empowering for the individual.

Through our APAC Floating Support service, NIACRO works with people who are at risk of losing their tenancy in the community because of anti-social behaviour and difficulties with neighbours. Referrals are made by both the Northern Ireland Housing Executive and Housing Association staff, as well as other agencies. The profile of people referred includes older adults living alone who have poor mental health, are likely to abuse alcohol, have poor social skills and whose behaviour impacts negatively on those around him/her. In many cases, such individuals have also been victimised in the community and could also be regarded as vulnerable adults.

Through our Base 2 project, NIACRO has worked with people being excluded from their communities by threats and acts of violence and intimidation. Our staff have advocated on behalf of individuals and families faced with losing their homes and we support people to remain safely in their area. During the past year, our APAC Floating Support service (funded by Supporting People) has extended to help those who have been intimidated because of their ethnic background with the launch of the STEM Project – Supporting Tenancies of people from Ethnic Minorities. We are currently living in a situation where local communities believe they are justified in refusing to allow non-local people to take up residence in the area, in spite of

their legal entitlement to do so.

In many ways, the sectarian divide in Northern Ireland has become tolerable and even acceptable – leading to ‘normalisation’ – because people will only choose to live in areas they regard as safe. In this context, we ought to be really concerned about the possible implications of tenant empowerment in Northern Ireland. If legislation is introduced to facilitate Tenant Empowerment, there is a risk that the negative influences in self-defined communities might derive increasing influence and control.

We have seen this happen in the allocation of tenancies to people from ethnic minority backgrounds, where those allocated housing on the basis of need, in accordance with current policy and practice, have not been able to take up the tenancy. Either the property has been damaged to prevent this happening, or the new tenant has been subjected to threats and/or intimidation. NIACRO’s STEM project provides support for these families and seeks to influence the community where it is possible to do so.

Promoting empowerment of tenants in respect of social housing should not be assumed to be a good thing in Northern Ireland at this point in time, unless it can be offered as an incentive to communities which promote values such as social inclusion and diversity.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

We agree that the proposals should have a generally positive impact across all Section 75 groups and that the introduction of any new services will be of benefit to all Social tenants and not just vulnerable groups or those deemed to be living in socially excluded areas.

Name of Respondent: Pat Conway

E-mail contact: consultations@niacro.co.uk

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: NIACRO

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Social Housing Reform Programme team
Department for Social Development
Ground Floor
Lighthouse Building
1 Cromac Place
Gasworks Business Park
Ormeau Road
Belfast
BT7 2JB

8 April 2015

Dear Sir / Madam

Tenant Participation Strategy for Northern Ireland: 2015 to 2020

The Northern Ireland Federation of Housing Associations (NIFHA) represents 24 registered housing associations in Northern Ireland. Collectively our members provide 44,000 homes comprising general needs, specialist and supported accommodation, as well as shared ownership. Housing associations are major social businesses investing over the long-term to deliver public benefit in meeting housing need, supporting customers and helping build thriving communities.

General comments

NIFHA warmly welcomes the publication of the draft Tenant Participation Strategy. We are pleased that NIFHA, our member housing associations and – most importantly – our members' customers have been able to assist the Department in developing it.

Local housing associations are already undertaking a wide range of effective work in the area of tenant engagement and empowerment. NIFHA has been sharing good practice from local landlords and colleagues across the UK at our events, in training and on our website. However, we are keen to do more.

The consultation document acknowledges that there is much positive activity already underway in our movement, including a significant number of tenants serving as members of housing association boards. Excellent work is also being done to empower people with learning disabilities and members of other vulnerable groups. Nonetheless, there is scope to increase the extent and effectiveness of tenant participation, and the Strategy can valuably contribute to that.

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

In publishing a Tenant Participation Strategy the Department is sending a clear signal to social landlords that it expects further strengthening of existing good practice in the sector and for all social housing providers to meet minimum standards. Accompanying the Strategy with a new regulatory standard will help ensure that all social landlords prioritise this area.

Consultation Question No. 2

Do you think the things we expect of a social landlord's strategic approach to tenant participation are appropriate and fair? Please explain.

We do believe that the expectations around social landlords' strategic approach to tenant participation are appropriate and fair. The ten principles of effective tenant engagement are helpful and largely reflect existing good practice. Overall the Strategy's expectations are robust but properly high-level, allowing flexibility for tenants and their landlords in how they are implemented. This is vital in ensuring this agenda is owned by customers and housing associations, and also in allowing space for practice to evolve and improve. Effective tenant participation will be manifested in a variety of ways depending on the landlord, locality and needs of customers.

The Strategy's recommendation that social landlords can determine whether they need to produce their own strategy is the right approach and we would advocate that this approach is adhered to. In common with the broader reforms to regulation, the demonstration of good outcomes that meet tenant needs is much more important than following particular processes.

Consultation Question No. 3

Do you agree that the Department should support the development of independent tenant support in Northern Ireland? Please provide your reasons.

NIFHA supports the establishment of independent structures that can provide support, advice and guidance to tenants and tenants' local groups. We agree that the introduction of an organisation of the sort that exist in the other UK jurisdictions, TPAS – the Tenant Empowerment Organisation is a good example, would help to equip tenants and landlords to do more in this area. It is encouraging that DSD will seek government funding for this purpose.

The consultation suggests that DSD will develop guidance on the detail of establishing tenant panels, tenant involvement in governance and developing tenant-based surveys. We believe it would be much more appropriate for this to be taken forward by the new tenant organisation. Government producing such

detailed guidance in operational matters runs contrary to the welcome strategic approach of the new regulatory framework that is currently being consulted on.

Consultation Question No. 4

Is the regulatory standard clear and understandable? If not, what more would you include?

Overall the proposed regulatory standard is reasonable, clear and understandable. We support its inclusion in the new regulatory framework.

It would be worth considering tweaking the wording so it reads: ‘Social landlords manage their businesses so that tenants and other customers find it *straightforward* to participate in and influence their landlord’s *activities* at a level they feel comfortable with...’ [suggested changes in italics] Well-designed and accessible opportunities for tenants to participate in a range of ways should be straightforward to access but they may not be easy; worthwhile activities rarely are. Also we recommend that the word *decisions* be replaced with ‘activities’ or ‘operations’. This is because limiting or focusing participation on ‘decisions’ seems unnecessarily and inappropriately restrictive. The alternative terms encompass the entirety of landlords’ operations. It would also avoid confusion that decision-making in housing associations is ultimately and wholly the responsibility of boards.

Monitoring of the Strategy and Standard

NIFHA has some concerns around the proposal to initiate thematic inspections of the strategy and new regulatory standard in 2016, only months after these are introduced.

Housing associations have been subject to many routine and thematic inspections in recent years. Our understanding is that through the new regulatory framework there will be a much greater emphasis on associations’ providing evidence of compliance through ongoing monitoring and reporting, and new expectations of accountability including annual reports to tenants and value for money statements. Therefore our recommendation would be that as in other areas, the primary means of obtaining assurance of compliance should be through this new approach, with thematic inspections only being initiated in the unlikely event of apparent non-compliance.

More clarity would be welcome on the proposed ‘advocate for tenants’ in the monitoring of the delivery of this strategy. We were not made aware of this proposal during the pre-consultation process.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme? Please provide your reasons.

NIFHA and our members are wholly committed to tenant empowerment. As well as particular rights in relation to their landlord, this term encompasses a wide range of activity that enables tenants to exercise agency and fulfill their potential. For example, landlord initiatives to increase training, skills and employment levels amongst tenants could be considered at least as important as new statutory rights in empowering tenants.

There has been very limited discussion of proposed empowerment rights with landlords during the pre-consultation process. Whilst we believe they may have potential, the proposals should be outlined in more

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

detail and explored with landlords, customers and stakeholders before a decision is taken to progress legislation to enact them. We note that as in England and Wales, it is not proposed to apply the Right to Transfer and the Right to Manage to housing associations. This is welcome. However there are many questions and potential pitfalls around the embryonic 'Community Cashback' proposal and how it might work – or not work – in our sector.

NIFHA understands that two of our members already work with Colin Neighbourhood Partnership in West Belfast to outsource their grounds maintenance in that area, providing valuable local employment opportunities. Our sector would be keen to explore extending such initiatives but, as the consultation notes, NI Public Procurement Policy presents challenges in achieving this. Therefore we would be keen to explore with DSD whether prior to or instead of new legislation, there is scope to achieve greater empowerment of tenants through quicker and less onerous means. If not, then new legislation is worthy of more serious consideration.

We hope these comments are helpful and are happy to discuss any aspect of them with the Department.

Yours sincerely

A handwritten signature in black ink that reads "Cameron Watt". The signature is written in a cursive style with a long horizontal stroke at the beginning.

CAMERON WATT
Chief Executive

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028 9089 7693

Northern Ireland Housing Executive

Housing
Executive

ACTING CHIEF EXECUTIVE
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Tenant Participation Consultation
Policy Project
DSD Social Housing Reform Programme
Ground Floor Lighthouse Building
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Belfast BT2 7JB

8th April 2015

Dear Sir/Madam

A Tenant Participation Strategy for Northern Ireland: 2015 to 2020

The Department for Social Development, through its Social Housing Reform Programme (SHRP), published a consultation paper entitled 'A Tenant Participation Strategy for Northern Ireland: 2015 – 2020'. Responses to the consultation were requested to be submitted by 5pm on Wednesday 8th April 2015.

Please find attached the Housing Executive's considered response to the draft strategy.

Yours sincerely



Mags Lightbody
Acting Chief Executive

The Department for Social Development's consultation
paper:
'A Tenant Participation Strategy for NI: 2015 to 2020'

The Housing Executive's response

03/04/2015

Housing
Executive

General comments

The Housing Executive welcomes the Department's proposals for a tenant participation strategy for Northern Ireland. Tenant participation has been a cornerstone of the Housing Executive's business for the last three decades. Customer views are paramount in the delivery of our services. Through our Community Involvement strategy we have in place structures and an environment in which we have meaningful engagement with our tenants and we can jointly develop positive outcomes for neighbourhoods across Northern Ireland.

The 2014 – 2017 Community Involvement Strategy is unique in housing across the UK. Today the Housing Executive works with some 450 community groups to consult on everyday issues and also to enable our tenants to make an invaluable contribution to policy development in areas such as anti social behaviour, rural housing and rent payment methods. Crucially, tenant participation is vital in promoting community cohesion.

It is the Housing Executive's view that any tenant participation strategy should have clear and inclusive structures, as with the Housing Community Network, there should be recognition of the voluntary contributions of participants and clearly defined roles and responsibilities for tenants and staff

The Housing Executive has noted that the Department's draft strategy considers existing and future tenant participation arrangements in the context of *current* social housing structures. It requires clarity around tenant participation throughout the SHRP process and in a post SHRP arena.

Initiatives for tenant engagement and empowerment will obviously need to be considered in the context of the potential new operating environment for social housing as a result of reform (for example the mechanisms suggested for tenant empowerment including the right to transfer would not be feasible or relevant for all potential future delivery models).

Decisions regarding the proposals presented in the Tenant Participation Strategy are also relevant to the options appraisal process (both monetary and non-monetary costs and benefits) for potential future new structures particularly in respect of:

- a) Regulation of social landlords
- b) Stock Transfer
- c) Delivery of Regional Housing services
- d) Role of the Department
- e) New legislation
- f) New formal structures for tenant support
- g) The Housing Executive's role as Regional Housing body needs to be reflected in the strategy.

A number of key responsibilities have been assigned to the DSD or to a new independent body that may actually rest with the Regional Housing Authority. Clear distinction between the department's strategic role and NIHE, Regional role, flexibly defined to align with the wider SHRP review, will reduce any nugatory work in this regard when the decision of future housing structures is determined.

For example:

- a. The provision of operational guidance to support department strategy regarding tenant panels or community group representation
- b. Development of an advocate for tenants and/or a tenant support organisation, whether this is a separate role from the proposed new organisation or an enhanced role for Supporting Communities NI.
- c. Management of a housing panel. More information is needed on how such a group would be constituted; with membership, scope and powers clarified.

The strategy states the Housing Executive would be accountable for ensuring the delivery against the strategic expectations outlined in the strategy. It is unclear whether this is for delivery by our own Landlord Services or to a wider responsibility for social landlords in our Regional Housing role.

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

- a. By ensuring specific tenant participation strategies are developed by Social Landlords or
- b. By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

1. The Housing Executive fully supports the aim of tenants having greater involvement in shaping and scrutinising the services that we and other landlords deliver. Therefore it is essential that landlords are required to deliver appropriate and effective opportunities for participation and are held to account accordingly.
2. It is our view that the consultation statements above are not mutually exclusive and so the Housing Executive would support the implementation of both proposals in tandem. A shared strategic direction for all social landlords which is translated into tailored strategies to fit each organisations' and tenants' needs is essential. A requirement for each social landlord to develop a strategy will provide assurance as to their commitment to the 10 principles of tenant participation and enhance accountability to customers. This must be linked with flexibility to allow each organisation to best meet the needs of its particular tenants and residents.
3. In addition, it is assumed the Social Housing Regulator will ensure, through the inspection process, that robust strategies are in place across the sector and that *robust* evidentiary requirements of the extent and effectiveness of tenant participation will be of sufficient type and scope to demonstrate real rather than nominal compliance with the 10 principles.

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

a. Yes

~~b. No~~

Please explain

- 4 The Strategy sets out DSD's 10 principles for tenant participation which will apply to all social landlords including the Housing Executive and registered Housing Associations. The NIHE already actively endorse the 10 principles of TPS in the implementation of our Community Involvement Strategy which seeks to deliver community participation through inclusive structures that embed mutual respect between tenants, community groups, Housing Executive Staff and Board Members. Consultation on the strategy took place with all key stakeholders throughout Northern Ireland, both internally and externally and Supporting Communities NI key stakeholders in this process. We already have a commitment in place to review our strategy every three years in line with the proposed review period set out by DSD.
- 5 In order to foster greater participation, TPS will encourage rather than require social landlords to develop a strategy for tenant participation which reflects the 10 principles for participation and, through DSD's inspection role, seek to ensure that tenants have access to information which allows them to decide in which participation activities they want to be involved.
- 6 It is important that the flexibility outlined at point 2.2 is allowed to reflect the range, client group and capacity of different social landlords. It should be noted many Housing Associations may have to carry out significant work to adhere to the standards by the proposed implementation date of April 2016.

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

a. Yes

b. No

Please provide your reasons

- 7 The wording of the question is such that a straight yes/no response is not appropriate to reflect the complexity of the issues involved. The Housing Executive currently uses Supporting Communities NI (SCNI) to fulfil this support role, providing a valuable and substantial range of services to empower tenants. They are already involved in a preliminary way in building capacity within the housing association sector. It is unclear how this new body will be distinct from SCNI in terms of the services provided to tenants given the Strategy acknowledges there is a considerable overlap.

It is unclear at this stage whether the creation of an entirely new model is the best value option which justifies the costs incurred in setting aside rather than expanding existing services across the social housing sector. As a minimum, consideration should be given as to how the social housing sector makes best use of the expertise and knowledge already available and the tenant participation and support structures which have already proven successful in the NI setting.

- 8 DSD state their intention to act in various ways to support tenant participation directly, including providing guidance, exploring funding to support tenants or support organisations and bringing forward relevant regulation and legislation. It is the Housing Executive's view that social landlords have a responsibility to fund or contribute to funding any organisation whose sole remit is to support our tenants and residents. Particularly since this facility would reap benefits for social landlords in terms of meeting TPS responsibilities and understanding what is important to our customers.
- 9 The Housing Executive, in partnership with SCNI, already fosters active participation in shaping our services by both tenants and residents who live in our estates. It is also important that there is no diminution of representation by the introduction of an independent body which represents tenants only rather than the wider scope of residents (including owner-occupiers and leaseholders) who are afforded an active role and voice in the current Housing Executive Housing Forum structures.

Is the regulatory standard clear and understandable?

~~a. Yes~~

b. No

If not, what more would you include?

- 10 The strategy does not clearly set out DSD's proposals for measuring landlord performance in this area. While a regulatory standard is included this is at a high level and so unclear whether what is proposed is reasonable, proportionate and commensurate for the full range of social landlords.
- 11 One stated strategic objective is to 'achieve better value from rental income and government investment'. Clarity is required on how this will be demonstrated.
- 12 The strategy makes reference to the current inspection process which is the subject of fundamental review as part of the SHRP. Therefore, in the absence of this programme output it is not possible for consultees to assess and comment on the full impact of the proposed new regulatory standard on our services, should the Housing Executive's landlord role change as a result of the housing structures review.

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

a. Yes

b. No

Please provide your reasons

- 13 TPS proposes that the opportunity must be there for participation to lead to tenant empowerment. The Housing Executive fully endorses the principle of more meaningful tenant empowerment; however it would be our view that the mechanisms by which this is achieved need further exploration particularly in the Northern Ireland context. The DSD intend to bring forward proposals to introduce into Northern Ireland the "right to manage", the "right to transfer" and an equivalent to the "community cashback" initiatives in England and Wales. It is acknowledged in the Strategy that this will require new legislation.
- 14 A fundamental aim of the SHRP review is to bring consistency and equality of rights and access to services across all social landlords. However the first two initiatives would only apply to tenants of the Housing Executive as the properties of Housing Associations are not owned by government. Consideration needs to be given on whether these are appropriate forms of tenant empowerment for NI.
- 15 The Housing Executive agree that a change in the law would be required to introduce a right to manage and a right to transfer the management of housing services relating to the homes of NIHE tenants to those tenants. Article 8A of the Housing (NI) Order 1981 currently empowers NIHE to prepare and submit a scheme providing for the delegation of management function to other person subject only to DSD approval. It does not confer rights or entitlement on any persons to request and compel the delegation of management of housing services. It is therefore a much more limited provision and is really designed to deal with the delegation of specialised management functions.
- 16 Regarding the impact of any such rights, the introduction of such a right limited to NIHE tenants only, for whatever reason, will result in differential treatment of secure tenancies in this regard. The detail of DSD's Equality Impact assessment of this aspect will have to be considered accordingly. However, it is noted that this is the position in England and Wales. Any decision on the introduction of additional legislation to provide for potential change to the landlord/tenant relationship within just one part of the social housing sector should only be considered in the context of the SHRP structures review and therefore any decision regarding the DSD proposed empowerment model should complement the wider SHRP decision-making timetable.
- 17 Community cashback proposals may also involve TUPE issues depending on the nature and extent of the activity to be transferred to the resident group and whether it meets the statutory requirements.

The introduction of any community cashback scheme should be available only within a social enterprise context to maximise support of the regeneration of our communities and to safeguard any benefits derived from the privatisation of public or voluntary housing maintenance for the residents of our estates. The Housing Executive currently has, through Community Service Agreements, a limited application of Tenant Groups taking responsibility and being paid for works on their estates. We have ten schemes throughout Northern Ireland where the community groups are paid to clean blocks of flats, move euro bins and carry out void inspections. The current value of this is £25,000 per annum.

- 18 All stock transfer policies, whether via a tenant empowerment vehicle or otherwise, should be considered in the context of a measured overall strategy for the Housing Executive going forward. This aspect of the strategy clearly overlaps with other areas of the SHRP review and so decisions should not be considered in isolation.

Do you agree with the findings in the Impact Assessment screening reports?

- a. Yes
- b. No

Please provide your reasons

- 19 Consultation is increasingly a matter of law and a key aspect of judicial review. It is also a risk management tool that ensures that all those likely to be impacted upon by a policy fully understand the impacts and have an opportunity to make their points or be engaged before any significant resources are committed to developing or implementing a policy. The Housing Executive would therefore emphasize the need for a planned and monitored consultation approach that ensures effectiveness proportionate at including, for example, disabled people (pan disability), BME and Migrant workers, Irish Travellers, children, older people, LGBT households, carers, as well as men, women and the religious and political communities in NI.
- 20 The report suggests that the proposals would be positive for everybody but does not specify how this will be achieved. The first screening question on page 13 of the Impacts document is a crucial question for any key policy. The proposals in this draft policy have the potential ultimately to impact significantly on people's lives. This key question is an opportunity to demonstrate how a policy appropriately accommodates those minority or less favoured groups and the question should be answered in full for each Section 75 category. For example, under "race" it is recommended that assurance is outlined that Traveller Families living in mainstream accommodation would have open access to the benefits of the policy with the necessary capacity support and confidence building to participate effectively.

This same approach would apply to, for example, disabled people, foreign nationals, children etc. regardless of the very clear need to demonstrate how religious difference would be accommodated. It is suggested that this principle of approach would apply to all questions in the assessments.

- 21 Questions 3 and 4 on the EQIA should be more explicit about how the strategy can *promote* good relations, which would require further details over and above how the strategy will provide a vehicle for communities to come together but will also allow the participants to develop anti sectarian and anti-racist strategies and ensure good relations is embedded in the organisations they are participating and engaging with, in other words a scrutiny role. Question 2 of the screening report, page 14, asks about opportunities to better promote equality of opportunity. Equality of opportunity is not a generic issue in its own right. The question is specific to nine categories and is about how inequalities between those groups are addressed within a policy.
- 22 Again it is suggested that this section should answer the question for each group i.e. religion, political opinion and race. This question essentially asks how does this policy proposal take into account anti sectarianism and anti-racism.
- 23 In summary, the purpose of a screening document is to demonstrate how the policy development has properly considered the interests of a wide range of groups of people who historically have not had proper consideration in public policy. It also informs consultees and informs their consideration of the policy itself. More detail may therefore be required to fully address these questions and meet this objective.

Demographic Information

Name of Respondent: Mags Lightbody, Acting Chief Executive

Email Address:

Please specify if you are:

a. ~~NIHE Tenant~~

b. ~~Housing Association Tenant~~

c. Other

Please provide Organisation Name:

NI Housing Executive

Northern Ireland Housing Council

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

30 March 2015

Dear Sir/Madam

Tenant Participation Strategy for Northern Ireland 2015/2020

The Housing Council welcomes the opportunity to respond to the Department for Social Development's Tenant Participation Strategy for Northern Ireland 2015/2020. Members would like to take this opportunity to thank Kevin McCarney, Shane Clements and Pamela Swann for attending their recent Meeting and taking Members through the document.

Following a lengthy discussion, Members views are as follows:

Members were concerned that this Plan is to increase 'tenant involvement' specifically for social landlords and feel that it should include private landlords and their tenants, as this may pose difficulties in mixed tenure estates.

It was agreed that there may be difficulties in getting tenants to 'buy in' to community participation and concern was expressed that many housing estates in Northern Ireland are controlled by paramilitaries and many tenants would be fearful to have their say or to get involved assisting decision making for their estates.

Another area of concern was the exclusion of those tenants of a vulnerable nature and those under-represented groups within estates, who would find it difficult to participate or may feel uncomfortable approaching other Members of their community, the usual protocol would be to contact their local elected representatives if they had any problems/complaints etc.

Members expressed concern that the lack of response and willingness from Housing Associations towards both local elected representatives and tenants alike and felt that this permissive attitude would need to be addressed by the Department, if this Strategy was to be a success. It was suggested that this Plan could be monitored as part of an Audit process instead of a new Strategy being implemented to ensure all social housing tenants have opportunities to getting involved in housing issues,

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Members reiterated that the project would not appear to be best use of public funding, which they felt could be included as part of an Audit process.

Members took exception at the suggestion to establishing a Housing Policy Panel for Northern Ireland to oversee this Strategy, Members felt this weakens and dilutes the role and responsibility of the Northern Ireland Housing Council, at a time in which the Housing Council feel they can increase and enhance their role, reflecting the collective views in Northern Ireland on public housing matters through their close interaction with constituents/tenants.

As a statutory body who has a consultative, monitoring and advisory role, Members felt that the Housing Council would be best placed to take on the Regulatory role of this Strategy and suggested that local Councils should take on the role of tenant participation through Community Planning.

The Housing Council requests that their views and concerns are taken on board for consideration as part of this consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Michael Coyle', written in a cursive style.

Michael Coyle
Chairman
Northern Ireland Housing Council

Roden Street Community Development Group

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords (With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods in itself is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in

determining positive consistent communities. It is relatively easy to demonstrate how you achieved tenant participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide your reasons,

This could offer other avenues of community development via environmental and physical regeneration. However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.
- Learning from historical knowledge as what works best in an area (in design terms).

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

- Taking learning from NIHE in relation to design and participation with tenants, such as in the area of the 'on the ground' and accessible maintenance officers.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes ✓

Name of Respondent _____ Roden Street Tenants & Residents Group

E-mail contact _____ rscdg@hotmail.co.uk

Please specify if you are:

NIHE Tenant ✓

Housing Association Tenant ✓

Other ✓
Owner occupiers

Please provide Organisation Name: _____ Roden Street Tenants Group

Sinn Fein

A tenant participation strategy 2015-2020

Sinn Féin welcomes the opportunity to respond to this consultation.

As part of our core principles, Sinn Féin views housing as a basic human right and the provision of social housing as a guarantee that right is achievable for everyone. We regard social housing as a valuable public asset that is best protected within the public sector.

In addition, we also believe social housing should be subject to appropriate policy development to ensure progressive realisation of international obligations, including those enshrined in European Convention on Human Rights (ECHR), International Convention on Economic, Social and Cultural Rights (ICESCR) and the United Nations Convention on the Rights of People with Disabilities (UNCRPD).

Tenant participation

Sinn Féin believes the department has an obligation to encourage all social housing tenants to be active citizens in defending and developing rights and safeguards and to recognise that it is within the wider context of public ownership and democratic accountability that tenants are most empowered and their rights most secure.

Housing Executive tenants

We note that NIHE must by law consult tenants on matters affecting their tenancies and that tenant participation is an integral part of the Housing Executive's structure. Sinn Féin believes the department should be working with the NIHE to develop established good practice.

As the main public provider, the Housing Executive should have a key role in protecting and advancing the rights of all social housing tenants irrespective of whether they live in a Housing Executive or Housing Association home.

The department should also ensure the participation of other groups, like the homeless and their representatives, who by definition are not social housing tenants, but whose right to housing and the right to the progressive realisation of access to social housing, is significant in the decision making process.

Housing Association tenants

Sinn Féin recognises that Housing Associations play a significant role in the provision and management of social housing but good practice is not consistent across the sector and many Housing Association tenants "have few opportunities to get involved with their social landlords and their services".

Given the level of public funding that Housing Associations receive, Sinn Féin believes the department has a clear duty to ensure that the rights of their tenants are safeguarded and should act as a powerful advocate in advancing the rights of Housing Association tenants to decent homes and communities.

The right to transfer, the right to manage and cashback schemes

Sinn Fein does not support 'the right to transfer' social housing from the public to the private sector.

We do not believe the public interest is best served by such a 'right to transfer'. Social housing is a public asset and as such encapsulates a wide range of 'rights' and 'interests' far beyond that of current tenants, not least future tenants, but also wider society.

Sinn Fein does not view the replacement of organisational responsibility with "unpaid volunteers" (page 15) under the guise of a 'right to manage' as 'empowering'. Providers of social housing have a duty to manage their housing stock in ways that meet statutory obligations. Any displacement of paid employees with unpaid volunteers cannot be viewed as progressive.

We do not believe the cash-back schemes are the best use of public money. The British National Audit Office concluded that it cost £1300 more per home to improve social housing following transfer. A cash back scheme based on inflated costs due to transfer is not value for money.

Misleading notion

In responding to this consultation, Sinn Fein is concerned that the document's use of language and presentation, particularly the interplay between notions of 'participation' and 'empowerment' is unduly manipulative.

In light of this we want to make clear that our responses in relation to participation are not in any way an endorsement of the policy of 'empowerment' as presented in this document which we oppose together with the wider policy proposal to remove social housing from the public sector.

The evocation of the notion of empowerment, particularly when attached to groups or communities that can be identified as marginalised and/or disadvantaged, has irresistibly progressive connotations, however the notion of empowerment can be far removed from the achievement of actual empowerment.

This is not simply Sinn Fein's view.

Research

Research has shown there is little evidence that the many initiatives with an empowerment focus actually empower either the target group or the communities to which they belong or within which they reside.

Some researchers have concluded that the vision of empowerment is largely illusory while the most ardent critics have suggested the notion of empowerment can simply be a mechanism to enmesh communities into a largely preordained policy agenda.

Evidence from research undertaken in Britain has shown that communities can be easily recruited and possibly manipulated into 'empowerment' initiatives where they have nothing or very little to gain, or which prioritise short-term gains over long-term benefits and safeguards.

Research has also shown how, having been recruited on the notion of empowerment, tenants' participation can be restricted and curtailed by 'rules' and 'routines' that benefit other 'partners'. This cannot be explained away as simply 'an implementation gap' or a need for greater 'capacity building' amongst participating tenants.

Democratic deficit

The document cites examples of greater tenant participation in England, Scotland and Wales through mechanisms such as regulation, standards, charters, however the narrative fails to point out that these developments are primarily designed to address the democratic deficit that has accompanied the privatisation of social housing.

It also fails to acknowledge the adverse impact on tenants exchanging established rights, such as secure tenancy, within the public sector for greater 'participation' and fewer and lesser rights following transfer. Greater participation accompanied by diminution of former rights is not 'empowerment'. It is window dressing.

Democratic accountability within the context of public provision and services is more empowering than minority participation, often subject to 'conflict of interest' restrictions on boards and focus groups within which is little more than a 'customer service' paradigm.

Fragmentation

The implication that there is a common interest amongst tenants ignores the reality that communities and societies can be fragmented with divergent interests and goals. Within the north of Ireland, this fragmentation is a fundamental and active dynamic within social housing.

This is particularly true in Belfast, where the majority of social housing tenants live in segregated estates. The provision of social housing remains a highly contested space within which violent intimidation, latent and actual, sectarian and racist, continues to be a feature.

Any undermining of public ownership and accountability is wholly inappropriate within this context.

Unequal access

It is also inappropriate given concerns highlighted by the UN Rapporteur on Housing about unequal access to social housing by Catholics in the north of Ireland.

Under international obligations to which the British government is a signatory, the British state and others have an immediate obligation, including the allocation of additional resources, to address discrimination, direct and indirect, in housing.

All agencies of state, including the department have a duty to ensure policy development adheres to the obligation to advance the right to adequate housing. Within the context of the north of Ireland, the provision of social housing is crucial to this advancement.

Sinn Fein believes the NIHE, as a public body subject to direct democratic accountability, is best placed to achieve progressive realisation and consideration should be urgently undertaken to assess any changes that may be necessary to assist the NIHE to fulfil this duty.

Defunct funding model

Sinn Fein would point out that initial consideration of the transfer of social housing into the private sector was based on a funding model that is no longer viable.

It would be reprehensible if DSD failed to learn the lessons from Britain by remaining unaware of the

many difficulties currently being faced by Housing Associations whose assured funding stream has been undermined by changes enacted in Westminster and whose future as social housing providers and the security of their tenants remains precarious.

Evidence in Britain shows that following transfer social housing costs more to manage and maintain, tenancies are less secure, promises to tenants do not have legal protection and evictions, particularly relating to rent arrears, and homelessness have increased.

Housing Associations who borrow money and then fall into financial difficulties can offer little or no protection to their tenants. Takeovers and mergers nullify existing tenant agreements and outright mortgage default can precipitate wholesale asset seizure and eviction, particularly if the land is more valuable redeveloped than the retention of existing social housing.

Legislation

Sinn Fein does not agree that the Department should introduce legislation to support the introduction of changes as outlined in this consultation document.

We feel it would be inappropriate for the department to allocate resources and funding towards the development of structures and organisations in anticipation of legislative changes without reasonable expectation of Stormont Executive support.

Impact Assessment screening reports

Sinn Fein does not agree with the findings of the Impact Assessment screening reports, specifically in relation to Section 75 categories, because;

- The assessment fails to identify the likely adverse impact the proposed fragmentation and privatisation of social housing on Catholics by making it more difficult to address unequal access.
- The assessment fails to identify the likely adverse impact the proposed fragmentation and privatisation of social housing on people with disabilities, particularly future tenants, by replacing statutory obligations within the public sector with the good practice obligations of the private sector.

Sliabh Dubh Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

Develop Forums similar to the case studies in Scotland etc, NIHE & Social Housing Community Networks where Tenants can be involved whether as an individual or in a residents/tenants group on a genuine joint partnership and equal basis to insure there is “housing structures that support the provision of social and affordable homes, in thriving communities where people are proud to live”.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord’s strategic approach to tenant participation are appropriate and fair?

Yes No

Please explain

Build on good practice already in place i.e. NIHE Housing Community Networks compacts and develop policies that Landlords can sign up to with regard the three points to foster greater participation and the social landlord’s strategy for tenant participation should reflect the *10 principles for tenant participation* included in the DSD Document.

- Develop and deliver a strategy for tenant participation;
- Have due regard for the information contained in this strategy, particularly the standards set out in Appendix B, when developing or reviewing their own strategy;
- Ensure that tenants and other users are made aware of and are clear about the participation activities and strategic approach to tenant participation.

The important thing is that tenants and other users are made aware of opportunities for participation and encouraged to participate. Tenants should find it easy to access information.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Please provide your reasons

This development would need “minimal change” in that Housing Associations start to work closely with community, tenants through NIHE & DSD structures and policies. The Department should further consider strengthening and developing the NIHE tenant support mechanisms already in place but also involving through new policy the support and participation of Housing Development Associations’ in genuine working partnerships with tenants and the community similar to those set up by

NIHE and that NIHE act as the tenant participation advisory service under the Housing Community Network similar to TPAS supported by and accountable to the DSD and local government. As stated within the document The Housing Executive has involved residents and local community associations in discussing and developing local services and addressing housing issues for many years has a wide network of community groups and has an established Housing Community Network which has different tiers of involvement which meets monthly. The network has evolved and the new community inclusion strategy has tenants involved in area scrutiny panels, inter-agency partnerships and working with difficult to reach groups. All policy changes are discussed and consulted at central forum. The Tenant, community and NIHE

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons

Empowering residents builds and maintains strong and cohesive estates, tenants should be consulted and given opportunities to develop joint policies and proposals with Housing Associations’ and landlords over any change in policy, i.e. Tenant contracts under any new tenant should include 6months probationary period monitoring lasting for at least 2years in relation to possible anti-social or criminal issues, although given that the waiting lists are still increasing and there is still so much demand from applicants there should be a policy on looking at equal numbers of Transfers within each new housing development to get better use of NIHE and Housing Associations Housing Stock.

Good practice examples should be funded and supported within supporting tenant empowerment such as parks and gardens projects, community activities and tenant initiatives including young advisors and leader’s programmes, outreach service for vulnerable residents, fun days and events, community safety, focus groups, surveys, housing surgeries.

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Concern is expressed over awareness of the cost of providing accommodation to meet demand in terms of those under-occupying and existing applicants on the Waiting list; There needs to be agreement that one-bed properties should not be added to any new social housing programme – this is seen as going against the work that has been done across the city to build sustainable communities; Flats in particular are seen as contributing to ASB and social isolation; There will be ongoing need for family accommodation, as families appear back on the Waiting List following repossessions – want to avoid creating undesirable accommodation; One-bed accommodation does not fit with housing association construction to Lifetime Homes standard. Any possibility of loss of Direct Payment to landlords, suggesting that rent would be last of tenants’ priorities when monthly budgeting. Direct Payment is seen as an important ‘safeguard’ for those on benefits, so that they do not need to budget monthly for rent. This is especially applicable given the considerable housing of vulnerable people by NIHE and Housing Associations’; advice should be available for vulnerable people.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes No

Please provide you reasons

Name of Respondent Margaret Hyland

E-mail contact margaretmarie07@outlook.com

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: Sliabh Dubh Residents Association

Slievban Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords
(With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development. The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

There needs to be a legal and statutory requirement for such participation to take place. A strategy or vague dialogue in relation to this will not be effective.

Consultation Question No. 2

Do you think the things we expect of a Social Landlord's strategic approach to tenant participation are appropriate and fair?

Yes No

Please explain

A strategic approach or vision related to tenant participation is indeed a welcome ask of social landlords. However, this must be substantiated with actual review of feedback where given and if this had any type of impact. The focus on participation measures and methods in itself is not enough. It is more imperative to review where information gleaned is reflected. Encouraging workshops, focus groups and gathering of opinion is the first but not the last step. It would be nice to witness how this feedback is actually represented in decision making, in action planning, in community design, in determining positive consistent communities. It is relatively easy to demonstrate how you achieved tenant participation, it is more difficult to illustrate what you actually did with the viewpoints you were provided with.

Consultation Question No. 3

Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

A Tenant Participation Strategy for Northern Ireland 2015 – 2020
Original Consultation Responses in full

Yes ✓ No

Please provide your reasons As long as this reflects, engages and adds to existing strong community networks and residents/tenants groups. This also needs to be resourced effectively and in a longer term capacity. There should be an avoidance of a top down approach and creation of another level of something which becomes bureaucratic, it should be locally driven and community based. It genuinely needs to be accessible and led by communities with some level of decision making to ensure that engagement actually has a point.

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes ✓ No

If not, what more would you include?

Yes just again a reiteration as to how evidence and feedback is reflected back into decision making.

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes ✓ No

Please provide you reasons,

This could offer other avenues of community development via environmental and physical regeneration.

However, without the proper foundations this could be irrelevant, such as;

- Tendering processes and how can the social economy model be best supported? (avenues for smaller providers/organisations/new start ups).
- This has to be locally driven and decided on.
- Quality measurement to be locally driven and review to be undertaken directly by tenants, quality to be measured not just in cost terms.
- Avoidance of this becoming a short term employment option.
- Learning from historical knowledge as what works best in an area (in design terms).
- Taking learning from NIHE in relation to design and participation with tenants, such as in the area of the 'on the ground' and accessible maintenance officers.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes ✓ No

Please provide you reasons

Name of Respondent Slieveban Residents Association

E-mail contact Irdougan@outlook.com

Please specify if you are:

NIHE Tenant

Housing Association Tenant ✓

Other ✓ Owner occupiers

Supporting Communities Northern Ireland (SCNI)

SUPPORTING
COMMUNITIES NI



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.

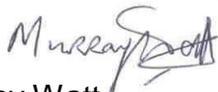
By way of an introduction to our comments on the draft Strategy, we take this opportunity to reflect upon the Minister's comments in the Foreword; SCNI has long advocated the establishment of an appropriate context for tenant participation in N. Ireland and concur with the Minister that the principal 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 ongoing 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 ongoing 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.

Social & Democratic Labour Party (SDLP)

The Department of Social Development
A Tenant Participation Strategy for Northern Ireland
2015-2020



The SDLP Response

April 2015

Introduction

1. The SDLP welcomes the opportunity to respond to this consultation as part of the Department for Social Development's ('the Department') Social Housing Reform Programme.
2. The fair provision of social housing based on objective need is a founding principle of the SDLP. The SDLP successfully led the campaign for reforms to end discrimination in housing and has been at the forefront of many other housing reforms since then.
3. Northern Ireland (NI) is experiencing a crisis of housing supply. Decades of underinvestment by successive Direct Rule regimes left NI with a depleted housing stock, record long waiting lists and high levels of housing stress and homelessness. Therefore, discussions around the future of social housing in Northern Ireland must focus on the need to address this lack of housing supply. SDLP Minister for Social Development, Margaret Ritchie MP, and her successor, Alex Attwood MLA, delivered record high levels of new social housing and it is imperative that their successors follow their example.

General comments

4. The SDLP welcomes attempts to enable tenants to participate in the development, management and assessment of their housing service. Successful and meaningful tenant participation can significantly benefit said tenants, social landlords and the wider community.
5. England, Scotland and Wales are notably ahead of NI in tenant participation and the SDLP welcomes the fact that the Department has included reference to these jurisdictions in the consultation document. The Department should engage with its English, Scottish and Welsh counterparts to establish best practice that can be emulated in NI.
6. The Northern Ireland Housing Executive (NIHE) has a statutory duty to consult its tenants on matters affecting their tenancies, as outlined in Article 40 of the Housing (NI) Order (1983). It is proposed in this consultation that tenant participation will be part of wider regulations. The SDLP seeks clarity on the possibility of legislating on this matter in the future.
7. The SDLP seeks clarity on the Department's definition of the "other customers" referred to in the consultation document. Non-tenants such as the thousands of people of waiting lists for social housing, homeless people, the traveller community and owner occupiers in mixed tenure buildings may also be users of social services and should be welcome to participate.
8. The SDLP notes that the proposals do not dictate that social landlords have a tenant participation strategy and that "tenant handbooks or other documents [...] [may be] valid." Given the Department's proposal to address the "lack of consistency within the Housing Association movement", clearer guidance on what is expected of social landlords is needed.

9. The Department must support social landlords to increase the extent and effectiveness of tenant participation. It must demonstrate to social landlords and persuade them of the benefits of effective and meaningful engagement with tenants. Begrudging adherence to the regulations may actually damage the relationship between social landlords and their service users. The Department must recognise the variation in experience and expertise of engagement with tenants across different Housing Associations and tailor their training accordingly.

An independent body to support tenant participation

10. The SDLP supports the concept of an independent body in Northern Ireland to support tenant participation and we welcome the Department's intention to "work with stakeholders to develop independent tenant support developing the skills needed."
11. However we would seek further detail around how the Department envisages the Tenants' Advocate would be established and how it would operate before we could comment properly.

Regulatory Standard

12. The SDLP acknowledges that regulations will play a decisive role in determining the success of the proposed strategy.
13. The consultation document does not specify the penalty for failure to adhere to regulations. The SDLP seeks further clarity on this.
14. The Regulator must be independent from the Department and from Government.

Tenant Empowerment

15. Tenants who wish to participate in the management of their housing service through Right to Manage, Right to Transfer and Community Cashback should be fully informed, supported and equipped to do so. An independent body to support tenant participation will play a vital role in ensuring tenants receive independent and well-informed guidance.
16. Legislation to support the introduction of tenant empowerment rights would help to support and empower tenants who wish and are able to participate fully in the management of their housing service.
17. The SDLP will thoroughly examine the detail of the draft legislation to ensure that it is robust and will properly empower tenants.

For further information please contact:

Paula Kelly

Policy Officer

SDLP

Telephone: 02890 521364 / 02890 247700

E-mail: paula.kelly@party.niassembly.gov.uk

South Eastern Health & Social Care trust



South Eastern Health
and Social Care Trust

8 April 2015

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

Dear Sir/Madam

A Tenant Participation Strategy for Northern Ireland 2015-2020

The Trust welcomes the opportunity to respond to the above consultation.

The Trust has considered the consultation document and has no further comments.

Yours sincerely

A handwritten signature in black ink that reads 'Elaine Campbell'.

Elaine Campbell
Corporate Planning & Consultation Manager

Southern Health and Social Care trust

A TENANT PARTICIPATION STRATEGY FOR NORTHERN IRELAND 2015-2020

COMMENTS

Q1 – The DSD needs to challenge social landlords to fully address the participation of tenants from marginalised groups, for example persons with a disability living within supported and social housing. There needs to be clear evidence of efforts made to engage with persons with significant communication needs to ensure their housing needs are fully considered and addressed.

Q2 – The principles as outlined for effective tenant participation are fair, but need to be firmly embedded in a requirement for action and delivery regarding same.

Q3 – The development of independent tenant support for tenants of housing associations would be welcome in NI funded by government as it would allow for greater advocacy for tenants in marginalised groups who may find it difficult to articulate or express their needs through other established consultation fora.

Q4 – Outcome measures as to how the standard will be met are needed for accountability purposes.

Q5 – Yes, legislation should be introduced to support tenant empowerment. This will be essential to ensure that the needs of all tenants living in social housing are kept under continuous review and are not ‘parked’ once a facility is opened. Through the introduction of legislation and a regulatory framework for same, Landlords will be held to account for the standard and quality of housing provided to tenants in NI.

Springhill/Springmadden Residents Association

Consultation Question No. 1

How do you feel the Department can challenge Social Landlords to increase the extent and effectiveness of tenant participation in Northern Ireland?

By ensuring specific tenant participation strategies are developed by Social Landlords

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

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Consultation Question No. 2

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Yes No

Please explain

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- Develop and deliver a strategy for tenant participation;
- Have due regard for the information contained in this strategy, particularly the standards set out in Appendix B, when developing or reviewing their own strategy;
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Do you agree that the Department should support the development of an independent tenant support organisation in Northern Ireland?

Yes No

Please provide your reasons

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and participation of Housing Development Associations' in genuine working partnerships with tenants and the community similar to those set up by

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Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

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Please provide you reasons

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Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes No

Please provide you reasons

Name of Respondent Peter Maguire

E-mail contact pmaguire1958@yahoo.co.uk

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: Springhill/Springmadden Resident Association.

St James Forum

Consultation Question No. 1

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(With measurement tools enshrined, feedback options)

By allowing Social Landlords the flexibility to demonstrate their achievement of the standards in other ways

Please provide your reasons

A focus on tenant participation is welcome, however, this must not be a 'tick box' exercise and should represent something substantive in terms of decision making.

The rights of new **AND** existing tenants and residents must be enshrined, as such there needs to be a legal framework and foundation to ensure that all relevant organisations participate in a realistic capacity. This should also be supported with clauses highlighting the need to reflect existing tenant's rights to a good quality of life and their knowledge in contributing towards positive community infrastructure development.

The ways in which the views of existing tenants and residents are gauged, reflected and meaningfully incorporated or considered must be listed and illustrated in the flowchart of this engagement process. There needs to be a real understanding of the impact of office based decision making on the daily lives of people who actually live, raise families and form communities in specified localities.

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Yes No

Please explain

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Yes

Please provide you reasons

Name of Respondent St James Forum

E-mail contact breigebrownlee@ymail.com

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Owner occupiers

Please provide organisation Name: St James Forum

St Mary's Community Group

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Please provide you reasons

Name of Respondent Seán Fryers

E-mail contact smra@live.ie

Please specify if you are:

NIHE Tenant
Housing Association Tenant
Other

Please provide Organisation Name: St Mary's Community Group

Upper Andersonstown Residents Group

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Name of Respondent Upper Andersonstown Residents Group

E-mail contact empgroves@msn.com

Please specify if you are:

NIHE Tenant

Housing Association Tenant ✓

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Upper Andersonstown Community Forum

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Name of Respondent Upper Andersonstown Community Forum

E-mail contact

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other
Owner occupiers

Please provide Organisation Name: Upper Andersonstown Community Forum

Upper Springfield Federation of Residents Associations

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Please provide you reasons

Name of Respondent ____Thomas Holland_____

E-mail contact tommyholland07@msn.com

Please specify if you are:

NIHE Tenant

Housing Association Tenant

Other

Please provide Organisation Name: Upper Springfield Federation of Residents Associations

Whiterock / Westrock Residents Association

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This development would need “minimal change” in that Housing Associations start to work closely with community, tenants through NIHE & DSD structures and policies. The Department should further consider strengthening and

developing the NIHE tenant support mechanisms already in place but also involving through new policy the support and participation of Housing Development Associations' in genuine working partnerships with tenants and the community similar to those set up by

NIHE and that NIHE act as the tenant participation advisory service under the Housing Community Network similar to TPAS supported by and accountable to the DSD and local government. As stated within the document The Housing Executive has involved residents and local community associations in discussing and developing local services and addressing housing issues for many years has a wide network of community groups and has an established Housing Community Network which has different tiers of involvement which meets monthly. The network has evolved and the new community inclusion strategy has tenants involved in area scrutiny panels, inter-agency partnerships and working with difficult to reach groups. All policy changes are discussed and consulted at central forum. The Tenant, community and NIHE

Consultation Question No. 4

Is the regulatory standard clear and understandable?

Yes No

If not, what more would you include?

Consultation Question No. 5

Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights – i.e. right to manage and right to transfer or community cashback scheme?

Yes No

Please provide you reasons

Empowering residents builds and maintains strong and cohesive estates, tenants should be consulted and given opportunities to develop joint policies and proposals with Housing Associations' and landlords over any change in policy, i.e. Tenant contracts under any new tenant should include 6months probationary period monitoring lasting for at least 2years in relation to possible anti-social or criminal issues, although given that the waiting lists are still increasing and there is still so much demand from applicants there should be a policy on looking at equal numbers of Transfers within each new housing development to get better use of NIHE and Housing Associations Housing Stock.

Good practice examples should be funded and supported within supporting tenant empowerment such as parks and gardens projects, community activities and tenant initiatives including young advisors and leader's programmes, outreach service for vulnerable residents, fun days and events, community safety, focus groups, surveys, housing surgeries.

Concern is expressed over awareness of the cost of providing accommodation to meet demand in terms of those under-occupying and existing applicants on the Waiting list; There needs to be agreement that one-bed properties should not be added to any new social housing programme – this is seen as going against the work that has been done across the city to build sustainable communities; Flats in particular are seen as contributing to ASB and social isolation; There will be ongoing need for family accommodation, as families appear back on the Waiting List following repossessions – want to avoid creating undesirable accommodation; One-bed accommodation does not fit

with housing association construction to Lifetime Homes standard. Any possibility of loss of Direct Payment to landlords, suggesting that rent would be last of tenants' priorities when monthly budgeting. Direct Payment is seen as an important 'safeguard' for those on benefits, so that they do not need to budget monthly for rent. This is especially applicable given the considerable housing of vulnerable people by NIHE and Housing Associations'; advice should be available for vulnerable people.

Consultation Question No. 6

Do you agree with the findings in the Impact Assessment screening reports?

Yes No

Please provide you reasons

Name of Respondent Pat Gregory

E-mail contact whiterockwestrockresidents@hotmail.com

Please specify if you are:

NIHE Tenant
Housing Association Tenant
Other

Please provide Organisation Name: Whiterock / Westrock Residents Association