



# EDINBURGH TENANTS FEDERATION

*Edinburgh's Federation of Tenants' and Residents' Associations*

## Response to the *Scottish Social Housing Charter: A consultation*

November 2011

### **1.0 Background**

Edinburgh Tenants Federation (ETF) is the umbrella organisation for tenants and residents groups in Edinburgh and a Registered Tenants Organisation. This paper outlines comments from a working group of tenants who met on 14<sup>th</sup> September 2011 and from two workshops at the joint ETF/City of Edinburgh Council tenants' conference on 8<sup>th</sup> October 2011.

### **2.0 ETF Comments**

#### **2.1 Areas that the Charter should cover**

ETF welcomes the opportunity to comment on the Charter discussion paper and will highlight throughout this paper, elements we think have been missed or are concerned about.

ETF is concerned about the constant use of the word 'stakeholder' throughout the document. It needs to be made clear if this refers to a tenant or landlord.

The definition of 'outcomes' need to be better defined. ETF is concerned that landlords may not be able to collate all the results together and furthermore, ETF would like the Scottish Housing Regulator to give an example of an outcome for future guidance.

The Scottish Government has stated that the Charter will be in force for five years from 2012-2017. However we would like to know how the Scottish Government intends to address any problems relating to the Charter before the five year term finishes.

Jargon is constantly used throughout the Charter. Information should be written in plain English and easy for everyone to understand.

ETF would be interested to learn how the Scottish Housing Regulator intends to assess how landlords monitor and evaluate certain aspects of the Charter.

The word 'can' is constantly referred to throughout the paper. ETF believes this is not strong enough and would like the Scottish Housing Regulator to consider using the phrase 'have the opportunity'.

There is no mention of tenants with mental health issues and ETF would like to see this addressed in the Charter.

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## 2.2 Participation

ETF is concerned that the document has not distinguished between 'tenants' and 'customers'. Customers have a choice, whereas tenants do not and this should be made clear.

ETF would like tenants to have the opportunity to be involved in participating and examples should be given on the various ways for tenants to become involved.

ETF is concerned about the jargon that has been used in this outcome. Information should be in plain English and easy for everyone to understand. Furthermore ETF would prefer the word 'capacity' changed to 'knowledge and understanding'.

Websites should have easy to follow instructions on how to gain relevant information.

ETF would like the Charter to give examples of the groups that are 'hard to reach'.

ETF would like an outcome which states that all landlords should have instruments in their local offices for recording information. This will allow tenants to watch or listen to any information and this will make it easier for those with literacy problems. Furthermore ETF would like to see housing staff take a more proactive role in asking tenants if they are happy with their tenancy and whether they have any questions concerning issues such as rent and antisocial behaviour.

The Scottish Government should consider an outcome relating to resourcing tenant participation adequately. This is because recently, the number of tenant participation staff has been reducing, and tenants are having little input in determining the resources for effective tenant participation. We would like landlords to be held accountable for their tenant participation resources.

## 2.3 Communication and customer service

ETF would prefer that "handled" is replaced with "dealt with" as it is more action focussed. Tenants' complaints may have been handled well, but this does not refer to whether the tenant's complaint has been resolved to their satisfaction.

ETF would like the Charter to recognise all communication needs.

ETF would like an outcome which states that landlords should provide feedback promptly, thus ensuring that any aspects do not persist for a long period of time.

There should be a procedure to examine how landlords monitor and evaluate complaints.

## **2.4 Housing quality**

The term 'all legal requirements' is too general and need to be explained in more detail.

ETF is concerned to note that not all tenants move into a property and the repairs have been completed. It is very important that all repairs have been completed before a tenant moves into a property.

## **2.5 Repairs, maintenance and improvements**

ETF would like to see the word 'participate' included when discussing monitoring and reviewing the repairs service and this should be compulsory for all landlords. Furthermore ETF is concerned about how the Scottish Housing Regulator is going to measure how landlords monitor and review their services and what the targets are.

## **2.6 Estate management**

The first outcome 'Taking pride in where they live' is too general. It should be made clear if this is for homes, the environment or both.

The word 'satisfied' is too general.

ETF would welcome a national 'estate standard' which tenants could locally influence.

## **2.7 Housing options**

ETF is concerned that tenants are not getting adequate choices through the choice based lettings system.

The lack of affordable housing is a particular problem in Edinburgh with over 20,000 tenants on the Edindex waiting list.

## **2.8 Access to social housing**

ETF believes that all allocations enquiries should be done under one roof and should not be the responsibility of each Area Office. There needs to be one dedicated team for allocations. 'One cap fits all'.

Tenants often do not understand how landlords allocation systems work although ETF agrees that landlords often have different views on what 'needs' are; who decides which needs are to be met and which are not?

There should be a balance of allocations taking into account the needs of homeless households and those on transfer lists. Therefore an outcome highlighting that allocations are fair would be welcomed.

ETF would like to know how the Scottish Housing Regulator would monitor satisfaction that landlords make the best use of the housing available.

## **2.9 Homelessness**

ETF is concerned that this outcome is too vague.

There needs to be definition of what 'temporary accommodation' is. Furthermore there are differences between 'hostels' and 'temporary accommodation' and this should be explained.

ETF would like to see some examples of 'other agencies' included.

The term 'locally agreed standards' needs to be defined.

## **2.10 Tenancy sustainment**

The term 'range of support' is too vague and needs to be developed.

ETF is concerned that many tenants do not know their tenancy conditions and there is a need for housing staff to ensure that this is addressed.

There are many different approaches for adaptations and there needs to be a single approach that is applicable to all councils and landlords.

## **2.11 Anti-social behaviour, neighbour nuisance and tenancy disputes**

ETF believes that this outcome should focus on tenants rather than residents as the landlords' responsibilities and contractual relationship are with its tenants.

Tenants should be able to report instances of antisocial behaviour without fear of repercussions.

This outcome could also include that individuals are content with the way that antisocial behaviour is handled.

There should be a follow on programme for tenants that have learning difficulties. Furthermore there should be a level of consistency across the board. For example, if an Officer is dealing with an issue of antisocial behaviour and it is then picked up by someone else, then there is little in the way of progress.

ETF would like to know how the Scottish Housing Regulator would monitor and evaluate that disputes are dealt with quickly and effectively. Furthermore ETF would like to know how tenants can get involved in reviewing and monitoring tenancy disputes.

## **2.11 Value for money**

ETF would like clarification on who is assessing the value – as tenants and landlords will have different ideas about whether value for money is being achieved or not.

An outcome is required which states that tenants should have an opportunity to influence the value for money – in determining any service efficiencies that would impact on tenants.

## **2.12 Rents and service charges**

ETF would like the sentence on the first outcome 'how far current and prospective tenants can afford them' deleted.

ETF would like to see tenants get involved in 'participating' in reviewing rents and service charges.

ETF believes that rents should be set against the cost of delivering services to tenants, rather than just taking into account whether tenants could afford rents. Because of the introduction of mid market rents, this outcome could actually influence higher rents, as more wealthy people can afford mid market values.

Landlords should be providing more support and information to tenants on welfare benefits. Furthermore ETF believes that it is very important that the benefits office works in partnership with landlords on this matter.

In order to influence rent setting, tenants need to be able to access information about housing finance and this should be made available in all formats and easy to understand.

## **2.13 Transparency**

ETF is concerned about the outcome 'how their landlord makes and implements its decisions'. We believe that landlords should be doing this regardless.

There is duplication between this outcome and the 'rents and service charges' outcome.

## **2.14 Services for Gypsies and Travellers**

ETF feels that this outcome should not be included at the end of the document as it implies that services for Gypsies and Travellers are an afterthought. Furthermore Gypsies and Travellers are distinct ethnic groups and the language describing these groups should be clarified.

There should also be an outcome that Gypsies and Travellers are able to influence services provided to them in the same way that settled tenants can through participation and that services provided are reflective of their needs.

There is also a question here about who defines the "need" for sites, as Gypsies and Travellers aspirations or "needs" will be different to those of the settled community and the Council due to cultural and lifestyle differences. The Charter needs to take this into account.

There is nothing in this section about access to sites for Gypsies and Travellers, including that Gypsies and Travellers understand the way pitches are allocated, and the information is available in formats that are appropriate.

### **2.15 Other Customers**

ETF is satisfied with this outcome; however feel this should be moved to after Homelessness.

## **3 Conclusion**

ETF looks forward to being involved in the consultation throughout the winter months. This response will be shared with the City of Edinburgh Council and the Borders, Edinburgh, East and Midlothian (BEEM) regional tenants' network.