



Llywodraeth Cymru
Welsh Government

The Right Stuff – Hearing the Tenants' Voice



Regulatory Board for Wales
Review of Tenant Involvement in Wales
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The Regulatory Board would like to thank everyone who contributed to this Review

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This report represents the views of the Regulatory Board for Wales (RBW). We are very grateful for the contributions we have received from the above individuals, although we recognise that the final report may not entirely reflect all of their views, or necessarily those of Welsh Government. Responsibility for the content of the report rests with the RBW.

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Tenant Involvement – Why Review? Why Now?

The Regulatory Board for Wales (RBW) is charged with advising the Minister for Housing and Local Government on the performance of the regulator and the housing association sector.

This is the third review undertaken by the RBW since it was re-constituted in 2016. This review complements the previous reviews which looked at *Value for Money* <https://gov.wales/value-money-review-2017> and housing association governance, *The Right Stuff – Improving Housing Association Governance in Wales*. <https://gov.wales/improving-housing-association-governance-wales-2018>

As part of our role the RBW wants to be assured that housing associations know tenants are, as required by *performance standard 2*, <https://gov.wales/housing-associations-registered-wales-revised-performance-standards> effectively involved in strategic decision making and shaping services in ways appropriate for tenants and their association.

In the light of the tragic events at Grenfell and the *UK Government's social housing green paper*, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733605/A_new_deal_for_social_housing_web_accessible.pdf the review has become even more relevant than when it was originally conceived.

Tenant involvement that works is an integral part of good governance and we see this review as complementary to *The Right Stuff* governance review. Listening to tenants and involving them in key decisions can also be important in developing a robust approach to value for money.

The Scope of the Review

We spent some time scoping the review prior to commissioning. It was decided the review should focus on seeking to establish a set of agreed principles to underpin effective tenant involvement. We wanted to ensure that the review got to the heart of key issues by ensuring it was not bounded by established orthodoxy.

In approaching the review, the Board were clear on two requirements:

a) A Collaborative Approach

The initial scoping study, which was undertaken between April – June 2018, involved semi-structured interviews with a range of key stakeholders, including members of the Regulatory Advisory Group (RAG), a small number of experienced and involved tenants, two current housing association CEOs in Wales, five independent consultants/ academics and staff in the Welsh Government Housing Regulation Team. This initial work sought the views of individuals about:

- What “tenants at the heart of regulation” meant to them?
- What they saw as the current issues with tenant involvement/participation?
- What is working well in tenant participation (and why)?
- What is not working (and why)?
- How might regulation make a difference?
- What they would like to see coming out of the strategic review.

This initial scoping shaped the approach to the review which was overseen by a steering group made up of various sector stakeholders chosen to represent a range of approaches and to provide effective challenge throughout the process. The steering group developed the subsequent review methodology.

We began with finding out more about the tenant involvement landscape by inviting speakers with a broad range of relevant experience and also considering ‘think pieces’ from different perspectives. A review of tenant involvement including more recent developments was undertaken by an independent consultant (*Tenants at the Heart review: phase 1 report*).

Later in the process different consultants were employed to organise an online survey for tenants and other stakeholders. Following this they also ran focus groups to explore the survey results; this is explored in more detail in *Listen, act, learn: aspirations for tenant and resident involvement*. Throughout the review the steering group received support from an external expert adviser.

b) Making a Difference

We recognised that the review should focus on the critical question of what tenant involvement is seeking to achieve. This approach ensured the focus was on engagement with tenants and all key stakeholders examining ‘what works’ and how stakeholders ‘know that it actually works’.

From the scoping exercise we formed the view that whilst there is a lot of tenant involvement activity being undertaken, some of it could be seen as unfocussed and not clear on the outcomes being sought or achieved. There is a significant amount of literature looking at the options on how to achieve involvement, but there is less research as to why it is undertaken.

For tenant involvement, the key question is:

What is the purpose of involving tenants, does it really work and is it making a difference?

Clearly this is a fundamental question. Involvement must represent value for money in terms of the effort and resources employed, as well as recognising the importance of respecting the value of tenant time and input.

Building on The Right Stuff

Building on the proven effectiveness of *The Right Stuff* model developed as part of the governance review, this review has also developed a tool to support effective thinking at all levels from an overarching strategy to individual involvement projects. The model is for all interested parties including boards, tenants, operational staff and management, to help ensure involvement makes a difference, to give a sharp focus to what tenant involvement is designed to achieve and making sure involvement maximises the desired outcomes. The tool is also for use by Welsh Government in developing its own strategic approach to tenant involvement.

What we call things?

We recognise that language, what we call things and why, is important and the review has further reinforced our thinking on this. Survey and focus group participants were asked what terms they preferred from the various choices of tenant; customer; resident; or engagement; participation; involvement.

People had varying, often strongly held, views. We have however settled on the term **'Tenant Involvement'** and in the context of this review tenants include residents, service users and customers.

Who is the report for?

- Anyone with a role or interest in tenant involvement, to help ensure their approach is robust and focused on achieving clearly articulated outcomes. It should also be useful for tenants and service users in holding their landlord to account. This could include local authorities as well as housing associations.
- The tool can be used to support strategic approaches to tenant involvement, individual projects, and by boards considering how they effectively hear the tenant voice as part of their board assurance arrangements.

Review Context

This review has taken place in a changing environment. The promotion of tenant involvement has been an important part of housing policy for many years. However, growing financial complexity and increased risks faced by housing associations has resulted in a focus on finance and high level governance. The question is has this been at the expense of issues of direct interest to tenants and of tenant involvement?

Combined with perceptions of an ongoing stigma around social housing, this has led to some tenant disquiet and a need to take a radical look at how landlords hear, understand and respond to the views of tenants. Overall, there is a need to ensure a balance between commercial imperatives and social values and avoid organisational monocultures where the voices of tenants get lost.

We believe a culture and ethos which is fully committed to tenant involvement will be most effective. This requires commitment at every level of the organisation including staff and the Board. For some this may mean moving away from a paternalistic culture where things have traditionally been 'done to' or for tenants, to a model of working with tenants.

The *Hackitt review*, <https://www.gov.uk/government/publications/independent-review-of-building-regulations-and-fire-safety-final-report> following the aftermath of the Grenfell tragedy, found that many tenants did not feel adequately consulted on changes to their building that could impact on safety. It found greater transparency of information; and consultation and involvement in decision-making processes were consistently raised as key areas where change is required. The tragedy illustrates the dangers of not listening to tenants and highlights the need for fresh thinking. It re-emphasises the need for a culture that actively seeks and listens to the voices of tenants and it is also worth noting the review took place at a time when there was (and remains) an ongoing debate regarding public trust in institutions.

In the context of co-regulation, housing associations are accountable to their tenants and we believe it is essential that tenants must have the information and the opportunities both to hold their landlords to account and help shape policies and services. In the age of social media, new technology can play a significant role in tenant involvement. There are advocates for a move away from long-standing hierarchical involvement structures; others however caution throwing away the learning from decades of involvement in the rush towards new media.

There are also questions about how the voices of tenants can be heard at the national level, by both the regulator and the RBW. If tenants are at the heart of regulation, are the current arrangements through which the RBW and the regulator seek and receive tenants' views (e.g. collaborative working with TPAS Cymru) adequate? Should there be different mechanisms which could provide greater opportunities for tenants to influence and comment on national issues or policies? At present this can be done via landlords and public consultation on specific issues, but there are currently insufficient opportunities for tenants or their representatives to engage directly with government.

Additional context is provided by The Well-being of Future Generations Act which requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. There are five ways of working that public bodies need to think about to show that they have applied the sustainable development principles set out in the legislation. As well as the importance of involvement and collaboration, these include acting to prevent problems, balancing long-term and short-term needs and considering how an organisation's objectives integrate with the objectives of other bodies. Whilst housing associations are not public bodies, all these ways of working are relevant.

Regulating Tenant Involvement

The Regulatory Framework for Housing Associations Registered in Wales <https://gov.wales/housing-associations-registered-wales-regulatory-framework> sets out the standards of performance set by Welsh Ministers.

Each housing association is responsible for demonstrating to the regulator that it is meeting those performance standards through a clearly evidenced self-evaluation and Annual Board Statement of Assurance, verified through ongoing, specific regulatory assurance.

In terms of regulation, as previously stated, *effective tenant involvement is required under PS2; effective and appropriate tenant involvement and high quality and improving services*. To meet the standard, associations must be able to evidence that tenants are effectively involved in strategic decision making and shaping services in ways appropriate for tenants and the organisation. In reaching regulatory judgements, the regulator considers whether assurance provided is sufficient or not.

Whilst the opportunities identified in this review do not form part of regulatory requirements, regulation managers will discuss, as part of regulatory oversight, how individual associations are responding to the opportunities for improvement set out in section 8 of this report.

A fundamental question considered during the

review however was whether the performance standards in their current form are clear enough on tenant involvement and also whether the current judgement dimension of governance (including tenant services) is sufficient? However, a timetable has already been set for a review of the Framework and performance standards in 2020. This was a recommendation arising from the initial review carried out in 2018 and was based on stakeholders wanting to see the Framework “bed in” over a longer period.

We consider that it would not be appropriate to look at this performance standard and the judgement dimension in isolation of the full review and therefore it is more appropriate that consideration of these important issues is undertaken as part of the full Framework review in 2020.

Key Vision and Values

A Vision for Tenant Involvement

We have concluded housing associations should take an approach which focuses on the outcomes they want to achieve, rather than adopt a specific methodology. The methods used should be dictated by what works best to realise the desired outcomes. In answering this question, associations should consider what does diversity in tenant involvement look like and how can they reach those tenants who are seldom, if ever, heard. Ultimately goals must be clear and the fundamentals right if tenant involvement is to be successful.

Involvement Characteristics

We have also identified a range of involvement characteristics, to assist all parties when considering the potential role and influence of tenants, although the list is not intended to be exhaustive.

Data	Provision of data to tenants, enabling them to gain some insight into their landlord. Collecting data about tenants in order to facilitate effective/tailored services.
Telling – information	Information is provided to tenants, the landlord determines the content.
Asking – information	Specific information is requested by tenants. Asking tenants for their views/feedback on specific issues.
Giving choices	Tenants are offered a number of choices by landlord.
Collaboration	Tenants able to work with the landlord to influence development of approach.
Co design/co production	Tenants partner with their landlord to ensure the outcomes will meet their needs.
Shared leadership	Some leadership responsibility is passed to tenants, providing significant influence over decision making.
Delegated power	Landlord passes decision-making powers to tenants within some areas.
Ownership	Tenants manage their own housing, with an equal share in making decision. For example, a co-operative.

From our work, it's apparent that key to successful involvement activity is a recognition that it's about effective relationships, with good communication, transparency and key values of honesty, trust and respect. This suggests that 'how you do it', is as important as what you do and chimes with wider findings from regulation work that it's culture, values and behaviours which makes the critical difference between success and disaster.

Questions housing association boards and management could ask themselves include:

- Have we thought about what tenant involvement is seeking to achieve?
- How will we involve tenants, at the outset and continuously?
- What approach works and how do we really know it works?
- Which method(s) from the 'Involvement Characteristics' will work for tenants?
- Have we asked customer-facing staff their opinion?
- Do we have an effective relationship with tenants based on good communication and transparency?
- Do the culture and values of our organisation (at all levels) enable us to undertake effective tenant involvement?
- Do we have a relationship of mutual trust based on honest dialogue with tenants?

Based on our findings, which are considered in the next section and draw upon the evidence presented to the steering group and the supplementary commissioned research, seven **Key Values** have emerged which we think can be applied to tenant involvement. These are:

- **Listening** – actively hearing what a diverse range of tenants say and learning from this.

- **Trust** – building trust and trusting others with vital decisions that affect them and devoting the time and resources necessary to do this.
- **Organisational ethos** – developing a culture which enables effective tenant involvement.
- **Collaboration** – tenant involvement is not something you do to people, but something you do with people.
- **Acting** – after you've done the listening, you must take action as a result of what you've learned.
- **Feedback** – provide feedback to tenants on what you've learned and what action you've taken as a result.
- **What works** – the methods used should be dictated by what works best to realise the desired outcomes, but should not be pre-determined.

What we've learned

This section provides a brief summary of what we have discussed and learned through the review process. For more detailed information you should read the Phase 1 and 2 reports.

- Phase 1 – Tenants at the Heart review: phase 1 report.
- Phase 2 – Listen, act, learn: aspirations for tenant and resident involvement.

Contested Territory

What has become clear through the review process is that tenant involvement is 'contested territory'. This includes:

- The language used – some people have strong views on descriptions (e.g. tenant; customer; resident), but there is no consensus. Others thought this debate was less important and potentially a waste of time and resources.
- The language used – involvement, participation and engagement are often used interchangeably. As noted, for this review we have adopted tenant involvement as the all-encompassing term.
- The purpose of the tenant involvement – Is it about improving services/performance, influencing decision-making, empowering individuals/or groups, ensuring accountability to tenants, seeking constructive challenge or something else? Alternatively, it may be more fundamental (e.g. building trust) and other objectives may flow from this.
- Modern versus traditional methods – in particular, how much emphasis is placed on digital and other technologies to engage tenants as opposed to face-to-face methods?
- Collective versus individual – how much emphasis is placed on seeking feedback from individuals as opposed to working with groups of tenants to explore things? And what role do formal tenant groups have?

- Transactional versus relational – is feedback on specific issues from tenants (customers/ consumers) sought in a time limited fashion or is engagement more long-term (citizenship role), developmental and broad in scope?
- Seeing things through a landlord or a tenant lens – The *Welsh Government review of tenant participation* <https://gweddill.gov.wales/docs/caecd/research/041201-tenant-participation-housing-management-design-en.pdf> published in 2004 found significant differences between the views of landlords and tenants, particularly in relation to whether there were positive impacts from tenant involvement.
- The role of tenants in governance and wider issues of accountability, in particular whether tenants are included on boards.

Given the above, it is not surprising that there is no one size fits all approach when it comes to tenant involvement.

Listening is important – but you must also act

We found that there is a strong appetite among tenants for engagement and dialogue with their landlord, and vice versa. When asked to summarise in a few words the key ingredients for successful communication, 'listening', 'communication', 'trust', 'transparency' and 'honesty' were the top choices.

Asked about the sort of dialogue they wanted with landlords, survey participants returned to the theme of 'listening' and building relationships. Tenants wanted to be properly informed and to have the chance to give their views, object if necessary, and have a genuinely open discussion.

The effectiveness of 'listening' to tenants is important. It must be accompanied by a commitment to taking on board what is said, being seen to respond to it by providing feedback, and then to learn from it. Participants felt they would know when tenant involvement was working through both

practical results and achievement of better understanding. This could be summarised as 'Listen, act, learn'.

It is also important that associations communicate to tenants and provide feedback on the action they've taken.

Culture, Trust and Mutual Respect

When the focus groups were asked about trust and respect, the discussion moved into a series of related issues of openness, power, accountability and above all dialogue. Notions of trust and respect were identified as fundamentally about the culture and values of an organisation, the mind-set of staff and its leadership.

Throughout there was a strong emphasis from all groups on soft skills and outcomes. It could be argued that the purpose of tenant involvement is not primarily to bring about specific practical outcomes but to engender a relationship of mutual trust, built through honest dialogue and respect, embedded at every level in an organisation. This approach will assist with collaboration which is seen as important both by tenants and staff.

This links to the strong message coming over about the culture of organisations. Repeated references to authenticity, genuineness, commitment and honesty suggest that tenants and professionals alike want to see organisations being open to dialogue, committed to it, and to making the changes that tenants feel are needed. That will involve some power sharing and compromise. An organisation which develops a positive approach to tenant involvement is more likely to succeed.

Going Forward

We would encourage everyone involved to consider what they are trying to achieve. All approaches have pros and cons and the approach chosen must deliver the desired outcomes and may be different depending on those aims.

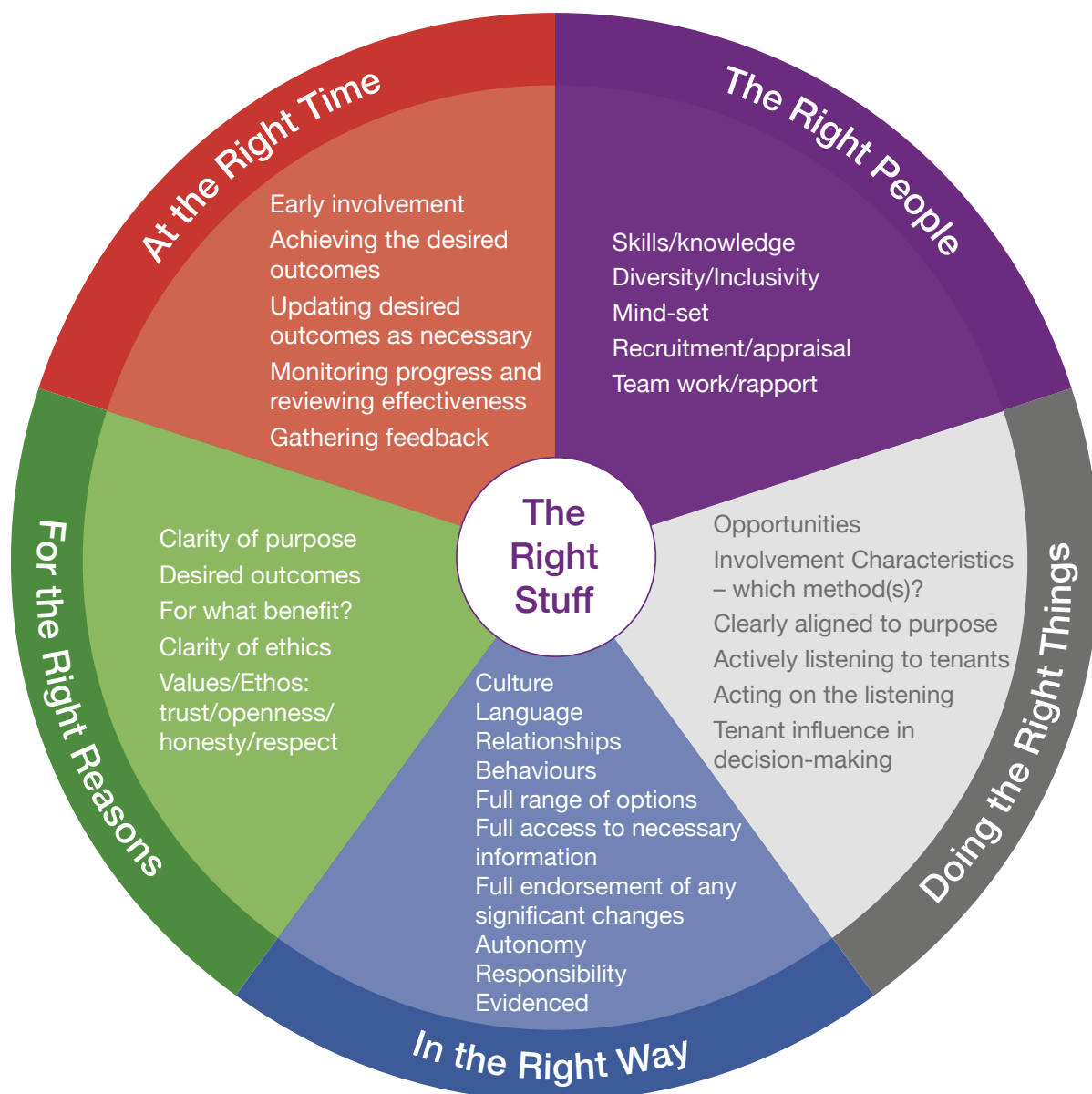
Therefore, every housing association should work with tenants to determine what approach is right for their organisation and their tenants. In doing this tenants and staff need to consider the different options available to them. A good starting point would be the annotated bibliography produced during phase 1 of this review, and the 'Involvement Characteristics' table.

A Model for Tenant Involvement

The Right Stuff – Hearing the tenants' voice

The Right Stuff is a high level framework to help understand and undertake good tenant involvement. This is intended to be indicative rather than prescriptive and the prompts are by no means exhaustive. The prompts are suggestions to stimulate thinking by organisations around the 5 key themes of the framework. They illustrate the kind of topics which it could be useful to consider under each of The Right Stuff areas, but each board and each organisation needs to decide what is appropriate for their particular circumstances.

Users can decide for themselves what they need to take into account to ensure that they are doing the right stuff when it comes to tenant involvement. However, one of the fundamental questions is how do tenants want to be involved?



Making it Happen

Key Messages – Developing more effective and inclusive approaches to tenant involvement in Wales

Who are these messages aimed at?

Given their responsibility for holding the executive to account and for setting the strategic objectives and the culture of the organisation, we consider these messages will be of particular interest to housing association board members. However, they are for everyone with an interest in tenant involvement – tenants, housing association management and staff, anyone involved in individual tenant involvement projects and the Welsh Government.

Why are you doing it?

- Although there are performance standards to meet, tenant involvement is not done for the regulator. Don't just aim to do what you think the regulator wants. Tenant involvement should be undertaken with integrity, not in a tokenistic way, doing what's right for tenants, as well as the organisation.

We need to go back to the fundamentals

Avoid doing things just because it's what you've always done. Ask yourselves:

- What is tenant involvement trying to achieve now and in the future?
- What works to achieve this?
- How do we really know it works?

Our survey conducted with tenants, landlords and other stakeholders indicates that the things which are important to them are the real fundamentals – listening, acting, trust and communication.

- How you do things is just as important as what you do.
- Focus on what you want to achieve and do what works to achieve that. It doesn't matter if the approach chosen may vary from previous practice.

Culture, values and behaviours are critical

- It is good relationships built on trust and a positive culture that makes tenant involvement work.
- Focus on constructive, honest, open and respectful relationships.
- Are you truly committed to meaningful tenant involvement or just going through the motions?
- Leadership must come from the top.
- There needs to be commitment across the whole organisation.
- Recognise it's a 'people thing'.
- Work to emphasise the positives of social renting for people and communities (thus helping to combat the stigmatisation of social housing tenants).
- Aim to continue building trust with tenants.
- Work towards being an even more inclusive organisation.

What you call things matters

- The language used expresses the balance of power and impacts, consciously or unconsciously, on the behaviour of all those involved. Language can imply passive or active approaches. Getting the language right is a key first step. For example 'customer', pre-supposes a certain type of involvement.
- Our work has shown there's no unanimity regarding the perfect language.

Potential language options include:

- Citizen, tenant, resident, customer, service user, community member, collaborators, those we serve, people.
- Involvement, participation, hearing the tenants' voice, collaboration, influence.

Clarity is vital when deciding on what language to use. A lack of clarity can lead to conflict; for example it could imply tenants have very limited influence.

What do we want to achieve?

Think it through using *The Right Stuff* tool.

- **Think it through before you act.**
Just rushing out and doing things isn't the best way forward.
- Use the thinking tool to help work out what 'you' want to achieve, how best to achieve it, and how to work out whether what you're doing is achieving the outcomes you desire.
- Involve tenants in working out what the desired outcome will be – this shouldn't be something that housing associations tell tenants without their input.
- Don't forget outcomes are not fixed; the desired outcome might alter with changing circumstances.
- It's about getting the right approach to achieve the right outcomes for your particular circumstances.
- When you know what you want to achieve, what works to attain this outcome?
How do you **really** know it works?
- Is your intended approach providing value for money? Is it achieving the outcomes you desire in the most efficient way?

Work in honest and open collaboration with your tenants

- Tenant involvement is not something you do to people, but something you do with people.
- How you do it is as important as what you do.

- It should not just reflect the landlord's priorities, it must also reflect tenants' priorities.
- Tenants should be involved early on, they should not just be asked to endorse decisions already made. Take a 'Tenants First' approach to considering new initiatives.
- Honest collaboration means making clear to tenants the full range of options that can be considered. Presenting a limited range of options means you're still working to the landlord agenda and runs counter to establishing the necessary respectful trusting relationship.
- Always provide feedback to tenants on outcomes. Complete the circle!

Board Assurance

Boards need to ensure that they have strong assurance that they have a robust approach to tenant involvement and must be able to evidence it. They should be asking if the organisation has sufficient information about the tenant perspective.

Tenant involvement in governance

During the review it became clear there is a misconception held by some that it is a regulatory requirement for housing associations to have tenants on their Boards – it is not. If this option is, however, considered an appropriate approach, these are points to consider.

- What is having tenants on the board seeking to achieve?
- What level of influence do tenants have as board members?
- Individuals are unlikely to be able to represent the views of all tenants.
- Do you encourage board members from local communities (who may or may not be tenants)?
- Research indicates that having tenants on boards is no guarantee of active tenant influence. It can actually marginalise tenant influence in practice.

- For individual associations the position may vary over time (sometimes with tenants on the board, sometimes not).
- Tenant involvement in governance is not just about tenants on boards. Other involvement structures feed into governance as well; for example the democratic body at Merthyr Valleys Homes.

Sharing Information and empowering tenants

- Housing associations should provide data to allow comparison with the performance of other landlords. This provides tenants with information they can use to scrutinise and to hold their landlords to *account*.
<https://gweddill.gov.wales/topics/housing-and-regeneration/services-and-support/regulation/housing-association-comparison-tool/?lang=en>
- There is a transparency obligation on landlords to honestly and openly share data. A full range of options should be presented to tenants before asking them to make a choice.

Making a difference

Effective tenant involvement is a priority for the RBW. We want this review and the tool we have produced to really make a difference.

That can only happen if everyone works together with a collaborative and open approach, applying the key principles we have identified. We want to see all parties embracing the opportunities set out in this report.

If this happens, we hope to see:

- Open and honest discussions taking place between housing associations and tenants.
- Tenants involved early in the process. Work with tenants, rather than deciding what they want unilaterally.
- Good practice being shared and embedded in the sector.
- Welsh housing associations recognised and known for the high quality of their tenant involvement.

Opportunities to Strengthen Tenant Involvement

We can see real opportunities to improve and extend tenant involvement. This needs input from everyone – individual associations, CHC, the RBW and the regulator, The Welsh Government, tenants and services users – and a high degree of effective collaboration. We all want to see effective tenant involvement, which achieves meaningful outcomes for everyone.

Opportunities for individual housing associations

- Use *The Right Stuff* tool to develop their approach to tenant involvement, at both strategic and operational levels.
- By using the model, add rigour to tenant involvement activity and develop a value for money approach.
- Work in close collaboration with those they serve when using the tool.
- Prioritise relationships to give the best chance of achieving desired outcomes.
- Ensure organisational culture is aligned to a tenant involvement approach.
- Boards to explain to tenants how they will respond to this report.

Opportunities for the sector

- Share positive practice, developing support around what good looks like and working together to learn.
- Align wider work on culture with values necessary to underlie effective tenant involvement.

Opportunities for CHC

- CHC to consider what activities, training and advice is required to support housing associations to implement the openness and accountability principles within the Code of Governance.

Opportunities for the regulator

- Seek assurance that *The Right Stuff* model is being used by housing associations in developing their approach to tenant involvement.
- When the Regulatory Framework is reviewed in 2020, to better understand the effectiveness of the current performance standard (PS2) relating to hearing the tenants' voice.

Opportunities for the RBW

- Develop more effective methods of including the views of tenants when reporting to the Minister on the performance of the regulator and of the sector.
- Consider whether PS2 requires strengthening in relation to tenant involvement/service quality and whether there is a need to for a separate judgement dimension for tenant involvement/service quality.

Opportunities for the Welsh Government

- Develop its own wider strategic policy for tenant involvement, ideally through using *The Right Stuff* model.
- Consider options to ensure availability of independent tenant advocacy and support an independent tenants' voice on national/non local issues. This would allow tenants to communicate directly with government on key issues and policies.