

## Matrix Housing Partnership

### Residents response to National Housing Federation consultation “At the heart: the Housing Association Code of Service Delivery and Accountability”

#### 1 Introduction

- 1.1 This response to the National Housing Federation’s consultation on their draft Code of Service Delivery & Accountability has been developed from a discussion on the Code at a seminar of residents from the associations that make up the Matrix Housing Partnership held on 22<sup>nd</sup> November 2008. The Matrix Housing Partnership is a housing association best practice and development group that consists of Accord, Ashram, Caldmore, Rooftop & Trident Housing Associations, and resident representatives were present at the seminar from all of these associations except Ashram. The response has subsequently been agreed by resident representatives.

*For ease of reference in this response, we have referred to the group that considered this response as “Residents” below.*

#### 2 Summary of key points

- 2.1 Residents agreed that having a Code is necessary and a good idea.
- 2.2 Residents agreed that if the Code is properly implemented and monitored it should improve the quality of life for residents.
- 2.3 Residents wanted to see *teeth* behind the Code – ie. that there would be consequences for non-compliance with the Code. Some residents were sceptical that associations will take the Code seriously.
- 2.4 Residents were concerned that the Code contains housing association jargon and that it should be jargon free.
- 2.5 Residents considered that residents should consider association compliance with the Code – with independent support if necessary.
- 2.6 Residents did not consider compliance with the Code to be a black and white issue, and considered that there will always be ways that associations will be able to improve the way they comply with the Code.
- 2.7 Residents were generally supportive of most of the content of the Code and did not want to see most of it changed. Nonetheless, residents suggested addition of the following points:
- meaningful customer profiling, diversity champions & residents knowing their rights to get involved included as part of the customer relationship
  - it should be residents and the Board who decide about mechanisms of accountability – the staff role should be to support residents and the Board

- an accountability pledge or promise is a good idea, but residents' views of how the association has met this pledge should be publicised
- there should be a *feedback loop* regarding service failings to ensure that residents understand how problems are being addressed. This is more important to service delivery than slogans.
- residents made detailed comments about communications, complaints & redress and choice
- the Code should refer to associations demonstrating how engagement, consultation and empowerment are leading to improvements in quality of life for residents. It was considered that residents seeing change coming about because of their involvement is vital to tackling resident apathy.
- support for residents should be seen as a method of valuing resident commitment to the association. The Code should also refer to associations considering remuneration of residents for some areas of resident involvement
- all associations should have a panel of empowered and accountable residents that consider strategic issues with the Board, and this should be seen as an integral part of governance. H5 Option 3 is a meaningless *cop-out*
- the Code should refer to potential different hats worn by resident board members; whether resident board members should be elected (and independent board members); defining Board confidentiality

### **3 Question 1 - how will the Code integrate with or provide a framework for your own customer service and accountability standards or promises? How could it be improved to make it easier to use?**

- 3.1 Residents did not refer to existing frameworks, but strongly identified the need for a common Code that sets out consistent baseline standards that would enable benchmarking between associations as a good idea.
- 3.2 Concerns were expressed by residents that the Code currently includes considerable housing establishment jargon, and that it should be jargon free to enable better access for residents. Once its substance is finalised, the Code could be submitted to the Plain English Campaign.

### **4 Question 2 - how would you use the Code on a practical level within your organisation?**

- 4.1 There was strong agreement that it should be residents who decide on an association's compliance with the Code, and that they should be able to do this on an empowered, independent and democratic basis. Having said this, concern was expressed that in some associations, it may be difficult for residents to perform this function, and there may be a need for external and independent support for residents. It was also considered that there needed to be regulatory *teeth* behind the Code, and consequences for non-compliance.

4.2 Residents proposed an annual check on compliance, with sub-groups looking at specific areas and measures in the Code on an ongoing basis. As part of the residents event, residents considered how well their associations currently comply with the Code, using a series of questions drawn from the Code to help them consider each section. The results were as follows (the scale used was from 0 to 9):

		Associations			
		1	2	3	4
<b>A</b>	Overall approach	5	5	4	4
<b>B</b>	Being held to account	5	8	3	7
<b>C</b>	Achieving excellence together	5	8	8	7
<b>D</b>	Communication	6	7	4	5
<b>E</b>	Complaints & redress	5	7	2	6
<b>F</b>	Choice	5	8	5	8
<b>G</b>	Engagement & consultation	5	9	5	8
<b>H</b>	Governance	3	4	2	6
<b>I</b>	Empowerment & control	5	3	5	0
<b>J</b>	Support for residents	8	9	7	9
<b>Totals (out of a possible 90)</b>		<b>52</b>	<b>68</b>	<b>45</b>	<b>60</b>

This was a thumbnail and relatively quick exercise that demonstrated that assessing compliance with the Code will not be a simple process. Tools will need to be developed to assist residents. The exercise also demonstrated that, whilst some residents considered their association very good in some areas, there is some considerable room for improvement, even in the best associations. It is possible that most associations would currently achieve similar scores if rated by their residents.

**5 Questions 3, 4 & 5 - Can you identify any additional key areas of service delivery, accountability or resident involvement that you would like to see included? What improvements would you suggest to the Code to allow scope for invention and for different associations to come up with their own solutions? How would you improve the Code to increase its usefulness for residents?**

5.1 Residents made the following comments on each section of the Code:

**(A) Overall approach** - it was considered that the definition of *truly resident driven* at A3 was correct in relation to an association being aware of and responding to resident needs. However, it was also felt that *becoming truly resident driven* also requires collective resident involvement in decision-making.

In relation to the Customer Relationship (A4), residents considered that the Code should refer to:

- the principles of *customer profiling*, where the association takes active steps to understand who its residents are, what their needs and aspirations are, and how they want to engage. However, it stressed that Residents did not want to see *customer profiling* becoming formulaic and *tick box*

- associations having officer and/or resident diversity champions in relation to equality, diversity and fairness (A4.4)
- residents knowing their rights and how they can get involved and what support would be available to become involved in decision-making

**(B) Being held to account** - it was considered that B3(1) – who decides what the *mechanisms of accountability* are - is essential in ensuring successful resident involvement. Residents agreed that residents should agree the association's resident involvement strategy – this following a pro-active process whereby residents are presented with different options and actively choose how residents are involved. However, residents said that the Code should be more specific in identifying that the Board should agree the resident involvement strategy (rather than simply saying *the association*) to ensure cultural buy in to the strategy at the governance level. The role of an association's staff should be to provide options and support to residents and the Board in considering the resident involvement strategy.

Residents agreed that associations should publish a pledge or promise about accountability – agreed by residents and the Board – but considered that the Code should also specify that associations should report residents' views on how well the association did against pledge.

**(C) Achieving excellence together** – residents considered that the key issue with regards getting the basic service right is that service failings should be followed through – that there should be a *feedback loop* publicised through newsletters, websites and reception areas, so that all residents are able to raise issues and see them being dealt with. It was considered that C3(1) – *aim to get things right, first time and every time* - is an empty and meaningless slogan. Residents are usually happy to accept that things go wrong sometimes provided it is clear to them that the association is learning from mistakes.

Residents identified that residents are usually particularly interested in repairs, reaching the Decent Homes Standard, how the rent money is spent, what residents get for their money, service charges and what they are used for, and immediate budgetary and improvements issues. Interestingly and positively, the residents considered that their associations now had more control over anti-social behaviour and so it wasn't considered a priority issues.

**(D) Communication** - residents agreed with the substance of the Code's communication section. It was particularly agreed that associations should agree a *comprehensive strategy for communication* with residents, but considered that this is rarely happening at the moment in the sector. The following additional points were made:

- whilst it was agreed that associations should tailor communications for particular groups of people, it was considered that an association's communications strategy should be based on its *customer profiling* – ie. ensuring that it tailors its communications approach on the basis of how all residents want to be communicated with

- that communications should be jargon free
- correct information should be provided on a timely basis and that there should be continuity and consistency in information provided
- a set of standards should be agreed regarding how staff communicate with residents – setting out deadlines for them to respond to resident queries; that they should be open and honest; that someone should always get back to resident queries; that there should generally be continuity of contact for a communication query with an available officer

**(E) Complaints & redress** - residents agreed that associations should take complaints seriously, and see them as an opportunity to learn. The following additional suggestions were made:

- the association's communication strategy should make it clear that complaints are encouraged, what a complaint is, and how it will be dealt with
- the *single point of contact* could be a *single point of responsibility* – ie. an association should identify an officer responsible for ensuring that complaints are dealt with in accordance with procedure. It was suggested that on occasion, residents think they have submitted a complaint, but it subsequently transpires that the association did not register the complaint because it wasn't submitted correctly. It should be simple and straightforward for residents to make complaints, and all staff should be trained to receive complaints from residents, log them and submit them to association officers responsible for dealing with them
- a reference number should be given to residents making complaints
- an association should provide feedback to residents on the progress of complaints
- the Code could refer to residents being *independent advocates* who could provide support to residents making complaints

**(F) Choice** – residents considered that choice over homes offered to residents (F2.9) is largely meaningless and that choice begins once the resident has been offered a home. It was suggested that choice with regards subsequent transfers might be a more relevant and real choice. It was considered that choice regarding how residents engage with the association should be identified as a choice. Residents considered that F2.8 was wishy-washy, meaningless, and not possible to measure.

**(G) Engagement & consultation** - it was considered important that associations should aim for more than a *tick box* lip service approach to consultation, engagement, empowerment and governance. Residents wanted to see an evidence base of how associations are engaging with residents, that clearly shows how resident engagement is leading to changes of benefit to residents and that the association can prove what it says it is doing.

- (H) **Governance** – see response to question 6 below
- (I) **Empowerment & control** – residents agreed in principle that empowerment and control models should be available for residents, but wanted to see the Code referring to residents being properly trained and accountable to residents in relation to resident controlled organisations.
- (J) **Support for residents** – it was suggested that the Code should refer to associations providing resources as the association valuing the commitment of its residents.

There was also a discussion, which perhaps should be referred to in the Code, about whether residents should be remunerated for elements of their involvement in associations. It was suggested that where residents act as mystery shoppers, resident inspectors, and in some other areas, that they are providing a service to associations that leads to business improvements, and that this should be recognised and remunerated. It was recognised that there are complex questions in relation to remunerating residents (the balance between voluntary resident representation and paid resident activity; accountability for paid resident activity; dealing with resident tax and benefits). Nonetheless, it was considered that the Code should highlight resident remuneration as an issue for consideration.

## 6 **Question 6 - What changes might you make to ensure that the Code provides a basis for putting residents at the heart of housing associations, while recognising the board's overall responsibility for the management of the business**

- 6.1 Residents felt that if residents are to be at the heart of housing associations, there needs to be a cultural change where *governance* of the association is extended to include a wider body of residents than just resident board members. Residents particularly agreed with option (2) of H5 - that there should be an empowered panel of residents that formally feeds into and impacts upon strategic decisions taken by the Board - but considered that all associations should have such a panel, considered an integral part of governance. Residents considered that option (3) of H5 was a *cop-out* and not of any equivalence to the other two options.
- 6.2 It was considered that democratic representation of residents was vital to resident involvement, and concern was expressed that if one resident raised a challenging issue on their own, they can be vulnerable. Residents also felt that there should be a clear charter defining the powers of resident representatives in governance of the association.
- 6.3 Residents felt that resident board members can keep a board in touch with services, but agreed that they are not there as resident representatives, and so cannot be considered a substitute for an empowered and panel of residents accountable to other residents.
- 6.4 Concern was expressed that the Code does not refer to:

- the need for associations and residents to consider how to deal with the potential different hats that resident board members wear (as board members, and possibly also as resident representative bodies) and conflicts of interest that might arise from them
- associations and residents deciding whether resident board members should be elected by residents. A further suggestion was made that the Code should suggest consideration of residents electing independent board members.
- a need for associations to be clear about Board confidentiality. Concern was expressed that associations sometimes prevent resident discussions of key issues under an unnecessary umbrella of confidentiality.