

London Tenants Federation

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Comment on ‘Together with Tenants’ NHF draft plan

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Introduction to London Tenants Federation

- 1.1 London Tenants Federation (LTF) is an umbrella organisation, bringing together representative borough- landlord- and London-wide federations / organisations of tenants (including leaseholders)¹ of social housing providers. Our membership also includes the London Federation of Housing Co-operatives and the National Federation of Tenant Management Organisations. A number of our member organisations involve both council and housing association tenants and a few involve private tenants. We are London’s largest democratic and accountable social housing tenants’ organisation.
- 1.2 Our focus is on engaging our member organisations in London-wide strategic housing and planning policy, facilitating the strongest possible consensus voice for social housing tenants in the capital. We respond to national consultations, highlighting London specific issues. We organise conferences and events sometimes in partnership with other tenant or voluntary and community sector organisations.
- 1.3 LTF and its forerunner the London Tenants Federation Forum, has had decades of experience in representing social housing tenants in the capital. Over this period of time there have been huge changes in social housing, including segmentation of the sector which has made it harder for tenants to engage with and work with one another.
- 1.4 LTF has had part time workers since 2002, initially with funding from the Association of London Government’s Housing Steering Group and later London Councils Grants Committee. Since 2012 we have received grant funding from charities, and through academics’ research grants.
- 1.5 Our response to the Mayor’s draft new London Plan consultation gained invitations for our members to attend 19 full or half day sessions at the ongoing five-month long Examination in Public of the Plan, including on: consultation, housing need, supply and targets strategy, strategic and local regeneration, estate regeneration, affordable, older peoples’ and student housing, housing size mix and safety and security.
- 1.6 Some of our project work has involved establishing and supporting networks of community and voluntary sector groups alongside tenants, including in London’s two Mayoral Development Corporation Areas (from 2014-18). The focus of these networks (including the [Grand Union Alliance](#)) was on attempting to influence and/or challenge planning policy in large-scale development areas.
- 1.7 LTF had representation on the Mayor’s Housing Forum from 2004-13 when the Forum was dissolved by the previous London Mayor, Boris Johnson. The Forum’s community engagement sub-group was established as a result of our delegates bringing a paper to the Forum on engaging tenants and hard to reach groups in the

¹ When referring to ‘tenants’ we mean both tenants and leaseholders (as set out in our Articles of Association)

regional agenda in 2005. An LTF delegate chaired that subgroup for part of its existence.

- 1.8 LTF has been instrumental in the development of new London Housing Panel, which will be funded by the GLA and Trust for London. It will involve a range of tenants, homeless and equalities groups. Two thirds will be London-wide groups and all will need to have a process for being accountable to those they represent or advocate for.
- 1.9 We have strong links and work collaboratively with other community and voluntary sector groups in London that also have an interest in housing, planning and community related issues.
- 1.10 We believe that tenants should be involved at all levels of decision-making about their homes and the future of social housing from the local to the regional and national level. We believe that with support structures and independent funding, it is not only possible for tenants to engage in an accountable and democratic fashion at a high-level decision-making, but that this should be positively encouraged by landlords.
- 1.11 LTF members are often invited to attend London Assembly Housing and Planning Committee meetings as panel members. In May last year we facilitated the delivery of presentations and comment from tenants across London at the London Assembly Housing Committee's meeting as part of their investigation into involvement of tenants in decision-making post Grenfell. The committee's Seven Good Principles for Resident Engagement set out on page 27 of its 'Hearing Residents Voices in Social Housing'² is a good response to the evidence they received in their investigation and a good starting point for any social housing landlord looking at tenant and resident involvement.

Comments and suggestions re the National Housing Federations 'together with tenants'

We have made suggestions throughout this section, which are highlighted in bold.

2. Individual and collective voice

- 2.1 While we agreed and support the aspiration that it should be the case that 'every tenant' as declared. **However, we suggest there should be a much stronger statement of recognition and support, (including financial assistance), for tenants to engage through democratically elected and accountable tenants' and residents' associations.**

We feel that this provides the the best eyes and ears for the problems that tenants might have where they live. Collective representation supports each resident in getting these problems solved, and does not prevent individual residents from directly contacting their landlord when they wish to do so. We feel particularly that with large PRPs this is the only way that tenants might be able to effectively hold landlords to account and have positive input into the way their homes re managed and maintained.

- 2.2 LTF members feel that what is important to tenants is:
 - being able to have the opportunity to share and exchange with other tenants and bring together common views and concerns at all levels of decision-making;

² https://www.london.gov.uk/sites/default/files/06.11.2018_london_assembly_housing_committee_report__0.pdf

- knowing that through this we are adequately informed and have legitimacy to express in a representative way;
 - being empowered with the knowledge that the time, effort and energy we have put into engaging, gathering a range of diverse views, and contributing those views has been respected and that the content has been heard; ensuring effective influence;
 - holding our landlords to account for the rents and service charges that we pay.
- 2.4 We feel that citizenship and participatory models are far better than consumerist models as they:
- encourage tenants to share, exchange, discuss and learn from one another;
 - facilitate provision of - mutual support, collaboration, expression of a stronger collective voices and stronger possibilities of effectively making influence;
 - give tenants the confidence to speak out;
 - provides opportunities for tenants to develop new ideas for, or alternative ways of, managing and maintaining homes;
 - can facilitate understanding of and engagement in strategic local, regional (in some parts of the country) and national housing policy.
- 2.5 Consumerist and selective models tend to leave most tenants feeling that what they have to say is dismissed or simply not heard. While the tragic example of Grenfell has highlighted this at its very worst, it is a very common cry from tenants. Our member organisation report that consumerist models engage fewer tenants, that elected tenant become more disengaged (because their representative voice has been reduced); tenants are less well informed and there is a much greater feeling of disempowerment.
- 2.6 We feel consumerist models of engagement to be tokenistic. The worst example of this is where individual tenants believe that they will have a real say if they are selected to sit on landlord boards. In this position, tenants generally seem to have no remit to couch the views of other tenants nor to feedback to them. These positions seem to be about training tenants to service the landlords' business plans not to provide a representative voice for tenants. It is a con that this facilitates tenants and landlords working together, rather that it leaves tenants without an equal and independent voice.
- 2.7 We feel the use of consumerist models of engagement have added to atomisation and negative stereotyping of social housing tenants. We know that on estates where there are active tenants and residents' associations that this helps enormously in increasing social interaction and helps in supporting strong and sustainable communities. Yet we know that in some instances where tenants of PRPs have set up tenants' associations landlords have not recognised them.
- 2.9 **It should be of no surprise though that where tenants manage their homes there is always a higher satisfaction rate than achieved by any local authority or housing association landlords. While clearly not all tenants want to manage their homes, we suggest that the NHF acknowledge this and work (with tenants) to achieve the same levels of participatory, democratic and accountable ways of managing homes and ultimately facilitate tenant empowerment.**
3. **A national tenants voice:**

- 3.1 In Every Tenant Matters, the Cave Review of Social Housing Regulation 2007³, Cave was clear that the voice of tenants needs to be heard not just by their landlord but at a local authority, sub-regional, regional and national level: at all levels where decisions that affect tenants are taken”. He also highlighted that this requires funding.
- 3.3 He commented in two separate sections about ‘legitimacy of representation’. In section 6.36. he said ‘a fully representative national tenant body that has regional and local elements would provide a level of legitimacy that the other options would not achieve. Incredibly, this was not taken on board, with suggestions / justification made that time and resources would hinder this occurring. What finally appeared in the (short lived) NTV was something in which most members were selected without the desired legitimacy.

LTF had suggested (i) the need for existing organisations regional and national to come together to provide ‘voices of tenants’ rather than necessarily one voice – noting wide differences across the country (ii) that these groups might operate by consensus to provide strength on issues where there might be commonality and (iii) that mapping should be carried out to identify where, geographically, tenants had no formal representation. These very reasonable suggestions were ignored, sadly leaving even larger gaps in tenants’ representative voices today.

- 3.4 We agree that there is still a need for a structure that facilitates tenants having the ear of the government. However, for this to be effective, it will also need to have a democratic and accountable structure in order to provide the legitimacy of voice that Cave originally talked about.
- 3.5 We suggest that the NHF acknowledge that failure to do this would consistently leave it open to challenge. Given the fact that there are large parts of the country without such structures, the first job for an organisation purporting to represent social housing tenants nationally would have to be to identify the gaps in representation and encourage social landlords to help fill those gaps.**

4, Housing associations – large and small

- 4.1 We receive far more complaints about larger housing associations than we do in respect of smaller ones. The fear is that large housing associations have increasingly moved away from their original social objectives and their past reputation of working sensitively with their tenants is gone. Many now describe larger associations as being ‘just like developers’ focused on developing market and so-called affordable housing, which isn’t actually affordable to households in London with below equivalised median income levels. We know from own on research that some are delivering only 50% ‘affordable’ housing with quite low levels of social housing in the London.
- 3.2 We are also advised that councillor’s mail-boxed are often full of complaints by housing association tenants. Failures to properly maintain homes and delivery of shoddy workmanship would seem to be the most significant issues. We note the increasing development of housing association ‘campaign’ groups as a result.

With such high levels of housing need in London, we argue that it is essential that existing homes are protected through good maintenance to ensure that they last as long as possible.

³ <http://www.thinkhouse.org.uk/archive/cave.pdf>

4. Landlord transparency and accountability is highlighted as a major issue.

4.1 For tenants to be able to engage effectively, they need to be well informed, yet tenants often struggle to gain access to information they want about their homes and the decisions that are being made on their behalf.

4.2 **We fully support the data commissioner's call for housing associations to be subject to FOI. We suggest that the NHF support this to help make the Tenants Together Charter sincere and credible.**

4.1 PRP tenants have far fewer legislative rights than local authority tenants do. The following are significant for tenants: the Local Audit and Accountability Act; Freedom of Information; the Public Sector Equalities Duty and Gunning or Sedley rules around consultation and the Right to Manage. **We suggest that NHF consider how in its Together with Tenants Charter PRPs might incorporate similar rights.**

5. Make tenants and residents involvement work – sharing best practice

5.1 While there has never been a halcyon past in which social housing tenants have felt listened to and respected by their landlords, at times there have been attempts to address this. There have been waves of legislation to promote tenants' rights, including the limited elements introduced by the 'Tenants Charter' (Housing Act 1980), 2000 participation compacts and the establishment of the short-lived Tenant Services Authority in 2008. **We suggest the NHF look at some of the more effective 'participation compacts' that were established by local authorities with their tenants.**

5.3 Again, we feel there is no good replacement for democratic and accountable grassroots tenants' groups. As we have already highlighted, they play a huge role in supporting and developing strong, supportive local communities. When joined together to form borough- or landlord-wide organisations we gain strength in shared knowledge and numbers to amplify our voice and to ensure we are heard.

5.4 Such organisations, while not as well supported as they were in the past still enable our own organisation to provide, as best we can, a consensus voice for social housing tenants to input at the London-wide and in national consultation.

5.5 **We suggest that the NHF include suggestions around how PRP tenants might also be involved in strategic policy and encouraged to engage in wider tenants' networks such as LTF in London.**

Yours sincerely

Pauline Hutchison and Pat Turnbull

LTF regional delegates