



SCOTTISH CONSUMER COUNCIL

**RESPONSE TO
“DEVELOPING BEST VALUE FOR
HOUSING SERVICES:
HOUSING QUALITY PLAN GUIDANCE”**

FEBRUARY 1998

**The Scottish Consumer Council’s response to
“Developing Best Value for Housing Services:
Housing Quality Plan Guidance”**

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A BRIEF GUIDE

- publicise ideas and information of consumer interest and concern;

The Scottish Consumer Council (SCC) was set up by the government in 1975 to promote the interests of consumers, particularly those who experience disadvantage in society.

While producers and suppliers of goods and services are usually well organised and articulate when protecting their own interests, individual consumers very often are not. The people we represent are consumers of all kinds: they may be council tenants, patients, parents, solicitors’ clients, public transport users, or simply shoppers in a supermarket. We speak up for them by communicating with the professions, industry, business, local authorities and central government, using careful research and persuasive lobbying.

Our broad aims are to:

- represent, promote and safeguard the interests of consumers in Scotland;
- promote the provision of advice and information, choice, representation and redress for the consumers of goods and services;
- identify issues and problems of specific consumer concern;
- monitor and report on services for consumers in the public and private sectors and recommend changes in practice where necessary;
- influence key decision-making processes, policy and practice;
- encourage consumer representation in the public services and the privatised utilities;

PUBLICATIONS

The Scottish Consumer Council publishes reports, policy papers and consumer information on a range of areas.

A full list of our publications is available on request from The Scottish Consumer Council, Royal Exchange House, 100 Queen Street, Glasgow, G1 3DN

The Scottish Consumer Council (SCC) welcomes the opportunity to comment on the draft guidance on housing quality plans.

- play a distinctive and leading role in Scottish affairs.

OUR APPROACH

When we investigate the way goods and services are being provided - whether it is buying a used car or going into hospital - we use six basic principles to guide our research:

- **access** - can people get the goods, services or information they need?
- **choice** - can consumers affect the way goods and services are provided through the choices they make in the marketplace?
- **information** - is information available, is it easy to understand, and does it help customers to make informed choices?
- **safety** - are goods produced to the highest of standards of safety?
- **redress** - is there a simple, cheap, quick and fair system for dealing with complaints and disputes if things go wrong?
- **fairness** – are consumers subject to arbitrary discrimination for reasons unconnected with their characteristics as consumers?
- **representation** - are consumers’ views properly represented in services where there is little or no consumer choice?

We welcome the emphasis given in the draft guidance to the importance of consulting consumers. In particular, we support the guidance provided that the customers of housing authorities include tenants as well as others, such as other residents, council tax payers, and housing applicants. Some time ago, the SCC wrote to local authorities asking about how they consulted consumers about housing matters. The responses we received related only to tenants, therefore we hope the guidance will stimulate wider consumer consultation.

We are particularly pleased to see an outline in the guidance of why participation matters, as well as the need for training and resources for consumers to enable them to participate in housing decision making.

While we welcome the discussion in the guidance on the use of complaints information within the Best Value context, this aspect of the paper is relatively weak. Section 4.2.10 begins by explaining the dual role of a good complaints procedure: to provide redress and to provide information about service failure. We strongly support this view of complaints, however, the section outlining the key aspects of a complaints procedure could be strengthened. We suggest the following as key aspects of a complaints procedure:

- Service users should be encouraged to express dissatisfaction when they experience it: the evidence from research into complaints in the public sector suggests there are many reasons why people do not make complaints. For example, they may be unaware of their rights, they may feel intimidated, or they may think the service provider will not listen to them. Service providers need to be aware of the barriers people face in making complaints, and need to view this as a lost opportunity to correct service failures.
- Service users should be informed of how to make complaints, and need information about the complaints procedures available.
- All complaints, whether verbal or in writing, should be acknowledged.
- The complaints procedure should be quick and straightforward. Ideally, the person to whom a complaint is first made should have the authority to resolve it.
- All complaints should be recorded.
- Information on complaints should be systematically monitored, and used to improve the service. This is an especially important feature in the context of Best Value and continuous improvement.

The SCC believes that it is important for the government to make clear its view on the minimum level of consumer consultation and involvement that it will consider acceptable in Best Value. While the draft guidance provides much useful information for housing authorities, an acceptable minimum would let consumers know of their right to expect to be involved in local authority decision making.

This point relates wider than housing, and we would urge the government to publish its criteria for judging the acceptability of local authority plans for Best Value. Until it does this, consumers will not be assured of being adequately or effectively involved in decision making. We are seriously concerned that the government has already exempted some local authorities from compulsory competitive tendering (CCT) on the basis of their Best Value plans, when its criteria for doing so have not been open to public scrutiny. The government’s criteria could be published in a number of ways, including in renewed citizen’s charters.

The draft guidance should make explicit, throughout the document, that the entire process of planning and management in housing should be based upon customer involvement. For example, section 5.1 discusses the setting of performance targets and the need to involve staff in this process. The section should also point out the need to involve consumers.

The following sections, on monitoring performance, on the other hand, give clear guidance on the role of consumers in this aspect of Best Value in housing.

the section which discusses Continuous Improvement needs to include guidance on the important role of consumers in identifying how improvements in a service might be achieved.

Finally, we suggest that Chartermark might be considered in the guidance as an approach to putting the customer first (considered section 6.7). The Citizen’s Charter and Best Value are closely linked, and Chartermark has been specifically designed for public services, as well as being widely used by public service providers for a number of years.