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*Date:* 4th September 2009

*Your ref:*

*Our ref:* RVL/EH

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Amanda Newton  
National Conversation Project Manager  
Tenant Services Authority  
4th Floor  
One Piccadilly Gardens  
Manchester  
M1 1RG

Dear Amanda

I am responding to the TSA Discussion Paper on Building a new Regulatory Framework.

The Council have held a Workshop, as recommended by the TSA, and I attach a copy of this and the covering letter sent in support of this.

The National Conversation findings accord with the Council's experience of working with Tenants over a number of years.

Your approach to regulation is probably the only sensible way that this matter can move forward within the current paradigm. However, the Council believes fundamentally that this will allow a two tier approach whereby service enhancements will be restricted and Tenants will not be able to aspire to the same level of services dependent on their landlord.

The National Standards are of some concern as, from a Local Authority view point, resources have been agreed with Government on the level of performance monitoring and we would not wish to see these become more burdensome.

In regard to the issue of tenants with care and support needs, we do need to ensure that there is not duplication with the regulatory framework governing Social Services.

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With regard to the two tier arrangements you propose, under the current system we see no alternative but would prefer that there be a level financial base for all social landlords.

The intervention and enforcement powers will, in our opinion, lead to landlords being cautious about setting aspirational standards.

In shaping the standards the TSA need to avoid on size fitting all and allow tenants to decide between a range of options what is their priority.

In terms of tenant empowerment and involvement, we feel that the Tenant Compacts need to be further developed to encourage involvement but to ensure that all tenants are able to influence service delivery aspects without the need for active participation.

Tenancy Agreements can be decided between landlords and tenants and the TSA's role should be to have examples of good practice and a framework of essential and desirable areas that the Agreement would cover.

The Governance issues for a Local Authority are challenging. We feel that Tenants should be able to influence decisions and be consulted before decisions are made, however service delivery for a Local Authority is such that it is not always sensible to have a two tier system – one for Tenants and one for Citizens.

The Local Authority sector works closely with the Audit Commission and further regulation in this field would not be welcomed.

This Council is keen to encourage value for money and believes the Government's principles of Best Value should be used to inform the National Framework.

The Council would be concerned to see additional burden introduced by the TSA in terms of monitoring requirements.

The Council is concerned that any grading system should be fair and equitable. Unless the financial circumstances of each landlord is similar we do not see how this could be achieved without creating a system which potentially is partial.

The best way to incentivise great performance and best practice is to reduce fees for your service.

The approach to ensure standards are met seems to be wide and provided these are used proportionately, the Council is content with these powers.

The registration process seems to be overly burdensome and should be streamlined.

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Finally, there should be a stronger link between the level of fee paid and the consultation which is currently being carried out. The Council is concerned that aspirational consultation without knowing the costs involved is not helpful and could be resented in the longer term.

Yours sincerely

A handwritten signature in purple ink, appearing to be 'R V Livermore', written in a cursive style.

**R V LIVERMORE  
EXECUTIVE MANAGER  
HOUSING AND PROPERTY MAINTENANCE SERVICES**

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