



Introduction

CIH called for strong proactive consumer regulation and welcomes the focus on putting tenants at the heart of services that is encapsulated in the social housing white paper. The Social Housing (Regulation) Bill provides a strong platform to underpin that robust approach and we appreciate this opportunity to provide comments on the draft directions to the regulator on tenant involvement and mutual exchange in the consumer standards.

CIH, together with the NHF, is developing an action plan to respond to the recommendations of the [Better Social Housing Review Panel](#), all of which focus on delivering improved services to tenants, and one of which explicitly calls for 'housing associations [to] work with all tenants to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles.'

Tenant involvement

Q1. Do you agree with the strengthened outcomes we are setting in the direction, as set out in paragraphs 18-22?

CIH agrees with the direction that landlords should ensure tenants have a wide range of opportunities to get involved, enabling tenants to engage on matters of importance to them. This should include both formal and informal mechanisms, with long and short term opportunities to suit tenants, and landlords should encourage and support tenant-led initiatives as the direction acknowledges. It refers to the opportunity for tenants to scrutinise landlords' strategies, policies and services, which should be interpreted broadly to ensure that landlords recognise and provide the opportunity for tenants to influence broad corporate decisions that impact on its operations, as well as the detail on core housing management and related services that it delivers.

Landlords need to understand the range and diverse needs of tenants so that they can ensure all have access to a wide range of opportunities for involvement including, where necessary, adjustments and support to facilitate this, so we welcome that being included in the direction on tenant involvement.

The regulator, in setting its own standard on tenant involvement and in the code of practice could usefully illustrate what it will seek in assurance from landlords that tenants:

- have been able shape the range of routes for involvement, influence and scrutiny of operations and services
- that they are satisfied both with that process and the ongoing opportunities for involvement that are developed through it
- that they can see the impacts their involvement has on the landlord's decision making.

We welcome the expansion of the tenant involvement standard across all tenants in low-cost rental and low-cost homeownerships (shared owners).



Q2. Do you agree with requirements that are being removed, as set out in paragraphs 23-24?

CIH appreciates the aim of proactive consumer regulation that enables landlords to work with their tenants to set standards and priorities that matter to them, and to have the flexibility on how that is delivered in practice. The directions clearly reflect that approach.

However, we understand that some tenants may be concerned at the removal of all /any requirements to demonstrate compliance, and some landlords may also value and benefit from such guidance. In addition, in relation to some buildings, landlords will be required to set out details of what they will consult tenants on and how they will take tenants' views into account (set out in the Building Safety Act 2022). If not in the direction itself, more detail or guidance may be appropriately developed in the regulator's standards set in response to the direction, and in the Code of Practice.

CIH does not disagree with the proposal to remove the requirement for an annual report but would expect that the regulator will want to be assured about regular information on performance being made easily available to tenants. This is not only for formal scrutiny purposes but more broadly for all tenants on issues that matter to them. Instead of this being in an annual report, it might be more useful for the landlord and tenants together to set out what information it will report on, how it will do so, and how regularly, to enable effective scrutiny and to inform all residents about landlord performance. Landlords will be required to publish the Tenant Satisfaction Measures but information for tenants should also encompass broader information on delivering to the wider consumer standards, and demonstrate the impact and value of tenant involvement on the outcomes.

Mutual Exchange

Q3. Do you agree with the additional requirement to offer support to tenants who would otherwise be unable to use the mutual exchange service, set out in paragraphs 28-29?

Yes, landlords should be aware of the diverse needs of their tenants and how they can best assist those who require more support to access services, including mutual exchange. It would be helpful for landlords and tenants, supported by sector bodies to share good practice on what such support might look like, to ensure that it is both effective for tenants and sustainable within the context of constrained resources.

Q4. Do you agree with the proposed approach to remove procedural details, as set out in paragraph 30?

CIH does not disagree with the proposal to remove the procedural details, however, landlords will need to be clear on how they will ensure tenants do access the greatest practicable number of potential properties for exchange, and be able to assure the regulator of that. A national register may be more effective in ensuring this than multiple different schemes.



About CIH

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple - to provide housing professionals and their organisations with the advice, support, and knowledge they need. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in twenty countries on five continents across the world.

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