Consultation on the revised directions to the Regulator of Social Housing: Tenant Involvement and Mutual Exchange

National Housing Federation submission in response to the Department for Levelling Up, Housing and Communities

March 2023

Summary

The National Housing Federation (NHF) is the voice of housing associations in England, representing almost 800 housing association members that provide homes for around six million people.

Housing associations are committed to providing safe, quality homes for all residents and we welcome this consultation concerning the revised Directions to the Regulator of Social Housing concerning Tenant Involvement and Mutual Exchange and welcome the opportunity to respond.

We are also aware that the directions will inform the revision of the Regulator’s consumer standards for registered providers. In this submission, we answer specific questions and set out our views on the changes proposed in the consultation.

Introduction

The National Housing Federation (NHF) is the voice of housing associations across England, representing 800 housing association members that provide homes to around six million people.

Housing associations are committed to providing safe, quality homes for all residents and we welcome this consultation and the opportunity to feed into the new directions to the Regulator on mutual exchange and tenant involvement.

As a sector, we are committed to being more transparent and accountable to our residents. We support the introduction of stronger and more proactive regulation, alongside wider changes outlined in the [Social Housing White Paper](https://www.housing.org.uk/news-and-blogs/news/government-publishes-social-housing-white-paper/), to give tenants greater powers and improve access to swift and fair redress.

Housing associations have taken the lead in the sector by demonstrating their commitment to resident engagement. Currently, over 220 housing associations have adopted the Together with Tenants charter. This represents over 86% of homes owned by our members.

Through the launch of the [Better Social Housing Review](https://s41584.pcdn.co/wp-content/uploads/BSHR_Report_FINAL_embargoed_until_Tues13thDec.pdf) and action plan which we plan to publish in the spring, the sector is taking action to ensure that residents always receive the high-quality service they deserve. The final report sets out seven very clear recommendations for the sector, including working with all tenants to ensure that they have a voice and influence at every level of decision-making across the organisation.

Tenant Involvement

We are working to ensure housing associations provide the services that residents expect from their landlord. This includes a commitment to doing more to make sure residents’ views are heard and acted on.

That is why the NHF agrees with the strengthened outcomes set out in the direction. We agree that tenants should have access to a wide range of meaningful opportunities to get involved with matters related to their housing and have the opportunity to scrutinise landlord strategies, policies and services covering all aspects of social housing management.

We also support the requirement for landlords to provide tenants with opportunities to influence and scrutinise any prospective new services, and where relevant, take reasonable steps to support tenants to establish resident-led influencing and scrutiny activities.

It’s vital housing associations prioritise the needs of tenants at all times. We, therefore, support the proposal to add a requirement for registered providers to offer support to meet the diverse needs of tenants and facilitate their involvement in activities.

We agree with clear and broad expectations of tenant scrutiny across registered providers’ activities and support the removal of overly prescriptive requirements regarding annual reports and references to tenants sharing in savings in connection to the tenant cashback scheme.

While we agree that the addition of broad requirements helps facilitate tenant involvement and enables registered providers to implement different approaches. Where appropriate the Direction should continue to encourage the provision of timely and relevant performance information to support effective scrutiny by tenants of their landlord’s performance.

We also support the removal of exemptions 1(2) of the current direction enabling the Regulator to set a standard on tenant involvement that applies to all registered providers with their tenants of low-cost rental accommodation and low-cost home ownership accommodation (shared ownership).

Mutual Exchange

We agree with the extension of the existing direction requiring registered providers to offer reasonable support for tenants to use the mutual exchange service so that registered providers must provide support for any tenant who would otherwise be unable to use the mutual exchange service or may not have access to the internet.

We also support the proposal to remove procedural details and as a result, issue registered providers with greater freedom in how they allow tenants to access mutual exchange services. Although expanding the range of mutual exchange services could increase the number of products available to providers and customers, it could also complicate the process and confuse residents.

To address this issue, we propose the creation of a single national service in the long term. Such a service would offer greater opportunities for cross-country mutual exchanges for tenants, while also reducing the resource implications for registered providers.

Conclusion

We welcome this consultation seeking views on the new directions to the Regulator. In our response, we support clear and strengthened outcomes for registered providers to meet the needs of tenants and support the smooth implementation of the new consumer regime. We look forward to working with the government and welcome the opportunity to feed into the consultation on the new consumer standards later this year.