



Tenant Involvement, Empowerment and Engagement Policy

Policy Name	Tenant Involvement, Empowerment and Engagement
Effective Date	1 st October 2026
Approved By	Harbour Light Board
Approval Date	10 th September 2026
Policy Owner/Dept	Governance
Policy Author	Peter McEleavey
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Version	Date	Changes	Approver

Relevant National Standards or Regulations	• Regulator of Social Housing – Transparency, Influence and Accountability Standard (revised standard effective 1 October 2026) • Regulator of Social Housing – Consumer Standards Code of Practice (revised version effective 1 October 2026) • Regulator of Social Housing – Tenant Satisfaction Measures: Technical Requirements and Tenant Survey Requirements • Social Tenant Access to Information Requirements (STAIRs) Policy Statement • Housing Ombudsman Service – Complaint Handling Code 2024 (Statutory Code)
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Relevant Legislation	• Housing and Regeneration Act 2008 • Social Housing (Regulation) Act 2023 • Housing Act 1996, section 51 and Schedule 2, as amended • Equality Act 2010 • Data Protection Act 2018 and UK GDPR, as amended
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1. Purpose

Harbour Light Assisted Living CIC ("Harbour Light") is committed to ensuring that tenants can express their views about their homes and landlord services, understand relevant information, and influence decisions that affect them.

This is a regulatory policy. It supports compliance with the Regulator of Social Housing (RSH) Transparency, Influence and Accountability Standard and the Social Tenant Access to Information Requirements (STAIRs). It also supports Harbour Light's duties under equality, data protection and the statutory Housing Ombudsman Complaint Handling Code.

Harbour Light is a micro housing provider with a small frontline team and approximately 251 tenants in supported accommodation. Engagement will therefore be proportionate, practical and targeted. Harbour Light will not rely on resource-intensive standing forums or frequent landlord-led meetings where other accessible methods are more effective and sustainable.



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Harbour Light recognises that tenants may have autism, learning disabilities and/or mental health needs. Some tenants may be non-verbal, have limited literacy or IT skills, or prefer to communicate through familiar Support Workers, representatives or advocates. Engagement will not depend on a tenant being able or willing to attend meetings, complete written forms or use digital services.

2. Scope

This policy applies to all Harbour Light tenants, Board members and employees. It also applies to arrangements with Support Companies where they assist tenants to communicate with Harbour Light or provide information relevant to landlord services.

Support Companies provide 24-hour support at Harbour Light properties and are in regular contact with tenants. Their day-to-day knowledge is an important source of information, but their professional view is not automatically the tenant's view. Harbour Light remains responsible for its landlord duties and for ensuring that tenants have their own meaningful routes to be heard.

3. Responsibilities

Board of Directors

The Board is responsible for approving this policy and obtaining proportionate assurance that tenant views are being sought, considered and used to improve services.

Harbour Light staff

Staff will use accessible and proportionate engagement methods, consider known communication needs and reasonable adjustments, record significant tenant feedback and ensure that issues are referred into the correct housing-management, repairs or complaints process.

Support Companies

Harbour Light will work with Support Companies to facilitate tenant communication where this is appropriate and welcomed by the tenant. Support Workers may help tenants understand information, communicate choices or relay a tenant's expressed view. Support Companies must not be treated as a substitute for the tenant's own voice where an individual tenant view, consent or decision is required.

Tenants, representatives and advocates

Tenants may engage directly with Harbour Light or with the assistance of a Support Worker, representative or advocate. Participation is voluntary. A lack of response will not automatically be treated as satisfaction with a service.

4. Procedures

The following procedures set out how Harbour Light will implement this policy in practice and meet the relevant legal and regulatory requirements.

4.1 Our approach

Harbour Light will provide a range of meaningful ways for tenants to influence and scrutinise landlord services. Not every method will be used for every issue. The method will reflect the importance of the



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issue, the tenants affected, their communication needs and the resources reasonably available to a micro-provider.

Engagement may include direct conversations with Harbour Light staff, telephone, email, letters, short surveys, feedback during property visits, targeted consultations, occasional property-based meetings or drop-ins, complaints and service requests, and communication through Support Workers, representatives or advocates.

Harbour Light will not rely solely on written, online or meeting-based methods. Where needed, information may be explained verbally, simplified, broken into shorter sections, supported by pictures or Easy Read-style material, or discussed with a familiar person present.

A tenant does not need to formally declare poor literacy or IT skills before Harbour Light considers an alternative communication method. Where a barrier becomes apparent, staff will use a practical alternative wherever reasonably possible.

4.2 Use of Support Companies and Support Workers

Regular liaison with Support Companies is an important part of Harbour Light's engagement arrangements. Where appropriate, routine liaison will include tenant voice and landlord-service issues.

Harbour Light will distinguish between:

- a tenant's view expressed directly to Harbour Light;
- a tenant's view communicated with the assistance of a Support Worker;
- a view communicated by an authorised representative or advocate; and
- a Support Company's own observation, professional opinion or operational concern.

Support Workers may take additional time to gather a tenant's views using communication methods familiar to that tenant. Where they are facilitating rather than representing the tenant, Harbour Light expects the tenant's own expressed view to be relayed as accurately as possible.

A tenant may always contact Harbour Light directly and may ask for a different communication route. Confidential tenant-specific information will only be shared with another person where there is an appropriate lawful basis and, where required, suitable authority to act on the tenant's behalf.

4.3 Consultation and influence

Harbour Light will seek tenant views where a proposed policy, service or decision is likely to have a material effect on tenants. Consultation may involve all tenants, tenants at a particular property or a relevant group, depending on the issue.

For significant changes to housing-management or landlord services, Harbour Light will consult while there is still a genuine opportunity to influence the decision, explain the proposal in an accessible way, allow reasonable time to respond and consider the views received before making the final decision.

Harbour Light will also provide reasonable and proportionate assistance where tenants wish to undertake tenant-led scrutiny or engagement activity relating to landlord services. The policy does not require a standing tenant panel or a fixed programme of meetings.



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4.4 Recording and acting on feedback

Harbour Light will keep a simple, proportionate record of significant tenant feedback and the actions arising from it. This may be recorded through existing case records, complaints records, meeting notes or a central engagement log rather than a separate complex system.

Records should, where relevant, show the topic, source of feedback, main tenant view, action or decision, and how the outcome was communicated back.

Harbour Light will use a clear feedback loop such as "You said / We did / We could not, because..." where this is appropriate. Feedback may be given directly, through Support Companies, by letter, on the website or by another accessible method.

Harbour Light will not judge the success of engagement solely by response rates or attendance. It will consider whether tenants had a realistic and accessible opportunity to participate and whether their views were properly considered.

4.5 Complaints and service learning

Complaints are an important source of tenant insight but are not a substitute for wider engagement. Expressions of dissatisfaction will be handled under Harbour Light's Complaints Policy and the Housing Ombudsman Complaint Handling Code, including where they are raised through a representative or third party.

Themes and learning from complaints, repairs, service requests and other tenant feedback will be used to identify improvements to policies and landlord services.

4.6 Information, transparency and STAIRs

Harbour Light will publish or make available information required under STAIRs and will tell tenants how they can access landlord information. From 1 October 2026, Harbour Light will comply with the STAIRs publication scheme requirements. From 1 April 2027, it will operate arrangements for qualifying information requests from tenants and their designated representatives.

Detailed STAIRs rules on information requests, withholding information, timescales, reviews and escalation will be set out in Harbour Light's separate STAIRs information-access policy or procedure so that this engagement policy remains concise and accessible.

4.7 Monitoring and assurance

At least annually, management will provide the Board with a proportionate overview of tenant engagement, including significant themes, examples of changes made, complaint learning, identified communication barriers and any action required.

Harbour Light will use this information alongside relevant service-performance and tenant-satisfaction information to assess whether tenants are being given meaningful opportunities to influence and scrutinise landlord services.

5. Review and Updates

This policy will be reviewed by April 2027 to confirm alignment with the full STAIRs information-request requirements and thereafter at least every two years, or sooner where there is a material



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change in law, regulatory requirements, Housing Ombudsman expectations or Harbour Light's operating arrangements.

The current version will be published or clearly signposted for tenants and made available in an accessible format on request.