

Regulator of Social Housing – Tenant Satisfaction Measures consultation questions

Question Number	Question	Requested format	Proposed answer
1A	<p>Do you agree that the proposed TSM Standard:</p> <p>sets clear expectations for registered providers?</p>	<p>Agree Disagree – feedback and proposed alternatives</p>	<p>Agree – The expectations are clearly outlined.</p>
1B	<p>Supports the regulator in ensuring that the TSMs provide tenants with greater transparency about their landlord’s performance (one of the aims of the TSMs in the White Paper)?</p>	<p>Agree Disagree – feedback and proposed alternatives</p>	<p>Agree Although we consider that the approach could be strengthened further in some areas, such as including a percentage of repairs completed first time measure we also recognise that your proposed approach could provide greater understanding and transparency. In this regard that the use of perception measure may be justified in terms of practicality and cost but they carry latent disadvantages e.g. heightened subjectivity or genuinely held “perceptions” that are empirically flawed. We suggest a need to introduce counter – vailing steps to balance against these disadvantages e.g. a regulatory / statutory obligation not to base sanctions solely on these perceptions (included in 12c)</p>
2.	<p>We are proposing to introduce two TSMs about timeliness of repairs (RP02 Repairs completed within target timescale and TP03 Satisfaction with time taken to complete most recent repair). Do you agree that both RP02 and TP03 should be used to measure timeliness of repairs?</p>	<p>Agree Disagree – feedback and proposed alternatives</p>	<p>Disagree - We recognise the need to create a manageable number of TSMs. We believe these proposed TSM be should be combined into one strong measure focused on effective resolution, e.g. % of repairs right first time.</p>
3.	<p>There are four proposed TSMs under the theme of Keeping Properties in Good Repair (RP01 Homes that do not meet the Decent Homes Standard, RP02 Repairs completed within target timescale, TP02 Satisfaction with repairs and TP03 Satisfaction with time taken</p>	<p>Yes No – provide alternatives</p>	<p>Yes – 80% of the 1,269 Wrekin customers who commented on the TSM proposal felt these gave a well-rounded view.</p>

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	to complete most recent repair). Overall, do you think they give a well-rounded view of performance under this theme?		
4.	Do you agree with the proposal to use the individual homes for which the relevant safety checks have been carried out as the basis for the following Maintaining Building Safety TSMs: BS01 Gas safety checks, BS02 Fire safety checks, BS03 Asbestos safety checks, BS04 Water safety checks and BS05 Lift safety checks?	Agree – please explain Disagree – please explain and offer any alternative suggestions	Agree – this approach could promote transparency to customers about the homes requiring a check rather than at block level, for example.
5.	There are six proposed TSMs under the theme of Maintaining Building Safety (BS01 Gas safety checks, BS02 Fire safety checks, BS03 Asbestos safety checks, BS04 Water safety checks, BS05 Lift safety checks and TP04 Satisfaction that the home is well maintained and safe to live in). Overall, do you think they give a well-rounded picture of performance under this theme?	Yes No – please explain and provide any alternative suggestions	No – We wholeheartedly endorse the approach to checks being completed. That we suggest is just the first step and should also capture or check that any subsequent requirements identified in the “checks” is captured and completed satisfactorily. For example, Fire safety checks should be done on time for 100% of effected property but the consequent actions that may be identified in that check should also be recoded and completed. This would, we suggest provide greater accountability, and assurance, to tenants that their homes are safe.
6.	Do you agree with the proposal that TP11 Satisfaction with the landlord’s approach to handling of complaints is measured by a perception survey?	Agree Disagree – please explain and provide any alternative suggestions	Disagree – whilst recognising the potential merits of this approach, we feel it may reduce clarity for tenants. This increases the opportunity for less tangible feedback and we would, as an alternative strongly endorse a transactional approach based on empirical data.
7.	There are four proposed TSMs under the theme of Effective Handling of Complaints (CH01 Complaints relative to the size of the	Agree	Agree – On balance we agree with the metrics. Combined with the neighbourhood category metrics, we did feel perhaps too many were

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	landlord, CH02 Complaints responded to within Complaint Handling Code timescales, TP11 Satisfaction with the landlord's approach to handling of complaints and TP12 Tenant knowledge of how to make a complaint). Overall, do you think they give a well-rounded picture of performance under this theme?	Disagree – please explain and provide any alternative suggestions	about counting items and could be replaced by additional satisfaction questions. This could be to include % of repairs completed right first time or satisfaction with letting homes or satisfaction that you trust your landlord.
8.	There are three proposed TSMs under the theme of Respectful and Helpful Engagement (TP05 Satisfaction that the landlord listens to tenant views and acts upon them, TP06 Satisfaction that the landlord keeps tenants informed about things that matter to them and TP07 Agreement that the landlord treats tenants fairly and with respect). Overall, do you think they give a well-rounded picture of performance under this theme?	Agree Disagree – please explain and provide any alternative suggestions	<p>Disagree - Historically our customers have told us (in relation to our current processes to track tenant's sentiment in this area) that they did not always understand the question about feeling listened to and having their views acted upon. We do consider this as an area where greater clarity might support the change that the sector and government are committed to. Accordingly, we suggest as alternatives measures on changes driven from customer voice work, or customer satisfaction with changes to engage. about satisfaction on engagement opportunities,</p> <p>We also feel there would be value to be gained from further consideration on the measure relating to informing customers about issues that matter most to them. As a potential tool to assure customers that we understand their priorities we see great value in this TSM. However, the word 'informed' we feel is quite passive and does not outline the partnership approach that our tenants should expect. Our preference would be a measure that captures satisfaction on opportunities to influence priorities and services or a transparent relationship.</p>
9.	For the TSM relating to satisfaction with the neighbourhood, we have presented a lead	Yes – I agree with the lead proposal	Yes – I agree with the lead proposal

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	proposal and an alternative option. Do you agree with the lead proposal that TP09 is Satisfaction that the landlord makes a positive contribution to neighbourhoods?	No – I prefer the alternative No – I don't agree with either option No – I don't agree with any measure on neighbourhoods	Whilst recognising the merits of both suggested options on neighbourhood satisfaction, as a provider with both rural and urban homes and dispersed and concentrated stock, our strong preference would be to ask about our contribution to an area. We take pride in our social value work but also do this in a proportionate, partnership based way to ensure we are also seeking value for money in our work. Not taking this approach we feel fundamentally undermines the comparability of data.
10.	Do you agree with the proposal that TP10 about satisfaction with the landlord's approach to handling of anti-social behaviour is measured by a perception survey?	Agree Disagree – please explain and provide alternative suggestions	Disagree – We suggest that this should instead be measured by means of empirically based transactional measures from tenants who have direct experience of the service.
11.	There are four proposed TSMs under the theme of Responsible Neighbourhood Management (NM01 Anti-social behaviour cases relative to the size of the landlord, TP08 Satisfaction that the landlord keeps communal areas clean, safe and well-maintained, TP09 Satisfaction that the landlord makes a positive contribution to neighbourhoods and TP10 Satisfaction with the landlord's approach to handling of anti-social behaviour). Overall, do you think they give a well-rounded picture of performance under this theme?	Agree Disagree – please explain and provide alternative suggestions	Agree – we agree these measures could give a well-rounded picture of performance on this theme.
12.	A. Please tell us your views on the number of TSMs by selecting one of the following options:	<ul style="list-style-type: none"> • Too many • Right number • Too few Please explain Yes – partially	Too few – A. In Autumn 2021 we spoke with our involved residents about the service areas they felt were priorities for them. Not all of their priorities appear in the Tenant Satisfaction Measures.

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	<p>B. Do you think there are any TSMs that should be added to or removed from the final suite of TSMs?</p> <p>C. Overall, do you think the suite of TSMs works well as a whole in providing rounded information to tenants about their landlord's performance?</p>	<p>No – please explain and offer alternatives</p>	<p>As a starting impression of a new landlord, and thinking about the circumstances that might lead someone to move home, our tenants felt that this was an important service area that should be measured. The proposed TSMs would not, we suggest provide a line of sight to our tenants on this.</p> <p>Whilst recognising that not every service could be covered by a TSM, we suggest this may not be an area or measure that tenants will regard as higher priority. We also suggest – see above – that the speed and effective resolution focus should cover other services and not just repairs.</p> <p>A TSM on the lettings of homes, for example would offer a well-rounded picture.</p> <p>B. We feel that a metric on value for money, particularly in light of the current economic climate, could provide tenants with important information. We also suggest removing the metrics on number of complaints and ASB, in favour of including further metrics on customer satisfaction, such as our later suggestions on trust or lettings.</p> <p>C. Yes – we received feedback from almost 1,300 customers and the majority felt the proposed measures would give them a strong understanding. Our Board and staff would echo this view also.</p>
<p>13.</p>	<p>Chapter 9 of the consultation document covers some general requirements that apply to all TSMs, which are addressed in more detail in Annex 2 Tenant Satisfaction Measures: Technical Requirements. These include how</p>	<p>Agree Disagree – please explain and offer alternatives</p>	<p>Agree</p>

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	providers should collect and report the TSMs, the types of homes that should be included, as well as the time period over which data should be reported. Do you agree with these proposals?		
14.	We propose to allow providers to choose the most appropriate survey collection method (e.g., postal, by phone, online etc.) to obtain data for the tenant perception measures TP01-TP12. Do you agree with this proposal?	Agree Disagree – please explain and offer alternatives	Agree - The flexible approach to carrying out the survey is in our opinion the right thing to do. This enables us to tap in to our customers preferences, empowering them to further hold their landlords to account. The approach ensures consistency and a way for our tenants to compare us not just to other landlords but other services they may have experience of through benchmarking. We also strongly agree that landlords should explain how this information has been collected as part of a transparent approach.
15.	Chapter 10 of the consultation document covers some requirements that apply to the TSMs which are tenant perception measures (TP01-TP12). These requirements are addressed in more detail in Annex 3 Tenant Satisfaction Measures: Tenant Survey Requirements. The requirements include survey type, survey timing, response options and who is to be surveyed. Do you agree with these requirements?	Agree Disagree – please explain and offer alternatives	Disagree – please explain and offer alternatives. Our customers did reflect on whether the perception-based approach might dilute focus on the direct service experience. In workshop discussions we discussed opportunities to use a blend of transactional, perception and perhaps more operational data. We assert that this would give a triangulated picture, rather than in places relying on perception or landlord performance alone.
16.	We propose to tailor our TSM requirements for registered providers that own fewer than 1,000 relevant homes. This includes not requiring them to submit TSM data to the regulator, allowing them to collect and report TSMs annually according to a reporting year other than 1 April to 31 March and allowing them	Agree Disagree – please explain and offer alternatives	Agree – we recognise the challenges for providers with fewer than 1,000 homes. We would welcome all proportionate efforts to ensure customers of these landlords are also able to understand and scrutinise performance.

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	to undertake a census tenant perception survey. Do you agree with this approach?		
17.	Chapter 13 of the consultation document covers our proposed guidance about the submission of information to the regulator in relation to the TSMs, which is set out in more detail in Annex 4. This includes generally not using TSM information as a source of regulatory intelligence in isolation, but rather as information we may take into account alongside other sources. Do you agree with this proposed approach?	Agree Disagree – please explain	Disagree – we agree with the principle that the TSM information is one source of intelligence. We would welcome this being included within the TSM Standard itself to ensure clear guidance for providers.
18.	Do you agree with our conclusions in the draft Regulatory Impact Assessment?	Yes – explain No – explain	Yes – we broadly agree with the draft regulatory impact assessment. We do feel, particularly in light of the range of financial pressures from net zero and building safety, for example that it would be prudent to publicly commit to subsequent reviews (and promptly publish that review(s))of the impact assessment at agreed intervals after the TSM implementation.
19.	Do you agree with our conclusions in the draft Equality Impact Assessment? The regulator particularly welcomes views on whether the proposals will have a positive or negative impact on people who share one or more protected characteristics (as set out in the Equality Act 2010).	Yes – please give evidence to support No – please give evidence to support	Yes – we agree with the conclusions and recognise that the flexibility of approach is important to reduce negative impacts. In relation to proposal 1, our data supports the assertion that younger customers are less likely to be satisfied.
20.	Finally, if you have anything else that you would like to tell us about the proposals relating to the tenant satisfaction measures, including the detailed requirements set out in Annexes 2 and 3, please tell us		In light of the challenging operating context (pandemic, for example), we also feel, for a period of time, there would be merit to a metric that considered the backlog of repairs. Whilst recognising this would show through in

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			<p>satisfaction, we feel this measure would support to understand issues that may turn into damp, for example, if left untreated.</p> <p>Rightly, organisations such as the NHF have placed considerable focus on equality, diversity and inclusion. We also welcome further consideration of how this could be expanded upon in the TSMs. We would suggest a metric about whether the tenant population is reflective of the local population by protected characteristic would add value.</p> <p>We also feel there is strong merit in feedback that others have suggested about the inclusion of a metric relating to trust. We consider this to be a useful indication of how tenants regard their landlord. A metric that specifically references trust, we feel would add value.</p> <p>Overall, we feel the proposals are logical, well considered and effective in driving the change that we all recognise would benefit customers. For us, understanding our customers' priorities is an integral part of our corporate strategy and the TSMs drive the need to work, in partnership, with tenants to shape and design services. Achieving this, will drive meaningful change for social housing customers. We would welcome any further opportunities to discuss the consultation and our views.</p>
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