

# Appendix 1- Tenant Satisfaction Measures

National consultation on the Regulator of Social Housing's proposals

Consultation questions	Task & Finish Group response
<p>→ Question 1A</p> <p>Do you agree that the proposed Tenant Satisfaction Measures Standard sets clear expectations for registered providers?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Agree.</li> <li>• Disagree – please explain and provide any alternative suggestions where relevant.</li> </ul> <p>For information to help you answer this question, see:</p> <ul style="list-style-type: none"> <li>• This document page 16</li> <li>• Consultation document pages 25–29</li> </ul>	<p><b>Agree</b></p>
<p>→ Question 1B</p> <p>Do you agree that the proposed Tenant Satisfaction Measures Standard supports the regulator in ensuring that the tenant satisfaction measures provide tenants with greater transparency about their landlord's performance (one of the aims of the tenant satisfaction measures in the white paper)?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Agree.</li> <li>• Disagree – please explain and provide any alternative suggestions where relevant.</li> </ul> <p>For information to help you answer this question, see:</p> <ul style="list-style-type: none"> <li>• This document page 16</li> <li>• Consultation document pages 25–29</li> </ul>	<p><b>Agree</b></p>

## → Question 2

We are proposing to introduce two tenant satisfaction measures 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?

### Answer

- Agree – please explain.
- Disagree – please explain and provide any alternative suggestions where relevant.

For information to help you answer this question, see:

- This document pages 9 & 10
- Consultation document pages 35–38

### Disagree

TP03 – The tenant’s response would only be focussed on the last repair, rather than any, or all, repairs they had received in last 12 months. In the current format the response to this question has the potential to be skewed by the tenant ignoring this request and commenting on a previous repair that may have been completed in less timely fashion, or their answer being prejudiced by that previous repair, even if the last repair was completed in timely fashion.

Alternatively, should the tenant select the last repair to comment on it will not register any dissatisfaction with the performance of previous repairs completion in the last 12 months.

Should the question therefore refer to the ‘Satisfaction with time taken to complete all repairs in the last 12 months’?

RP02 – all landlords are likely to have differing completion targets; some could have harsher targets than others and could be penalised for stretching themselves. Should the regulator set an industry standard set of completion targets to ensure absolute consistency.

### → Question 3

There are four proposed tenant satisfaction measures 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 to complete most recent repair). Overall, do you think they give a well-rounded view of performance under this theme?

#### Answer

- Yes.
- No – please explain and provide any alternative suggestions where relevant.

Please tell us if you have any comments on any of the individual tenant satisfaction measures under the theme of Keeping Properties in Good Repair.

#### For information to help you answer this question, see:

- This document pages 9 & 10
- Consultation document pages 35–38

### No

There is likely to be discrepancies in the landlord response to RP01 Homes that do not meet the Decent Homes Standard due to the Decent Homes Guidance allowing for exclusion due to tenant refusals to upgrade homes.

In addition, we believe it would be worthwhile collecting the number of exclusions for monitoring purposes, with a review of the findings by the Regulator in due course.

### → Question 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 tenant satisfaction measures: BS01 Gas safety checks, BS02 Fire safety checks, BS03 Asbestos safety checks, BS04 Water safety checks and BS05 Lift safety checks?

#### Answer

- Agree – please explain.
- Disagree – please explain and provide any alternative suggestions where relevant.

#### For information to help you answer this question, see:

- This document pages 10 & 11
- Consultation document pages 39–42

### Agree

In addition, we believe it would be worthwhile collecting the number of expired gas safety checks for each landlord due to lack of access provided by the tenant, with a review of the findings by the Regulator in due course

### → Question 5

There are six proposed tenant satisfaction measures 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?

#### Answer

- Yes.
- No – please explain and provide any alternative suggestions where relevant.

Please tell us if you have any comments on any of the individual tenant satisfaction measures under the theme of Maintaining Building Safety.

#### For information to help you answer this question, see:

- This document pages 10 & 11
- Consultation document pages 39–42

### No

Whilst we understand why an Electric Servicing measure is missing at this stage, pending further consultation, we believe an interim measure could be added to the TSMs to monitor periodic electrical inspections of social housing properties every 5 years.

### → Question 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?

#### Answer

- Agree – please explain.
- Disagree – please explain and provide any alternative suggestions where relevant.

#### For information to help you answer this question, see:

- This document page 15
- Consultation document pages 43–46

### Disagree

We understand the context provided in the consultation documents and agree this will be a difficult measure to quantify given the small number of tenants who may pass through the corporate complaints process. However, we also believe the accuracy or the credibility of the survey result for this question will not necessarily give a fair reflection on a landlord where tenants have not raised a complaint or dissatisfaction.

We suggest that the question reflects expressions of dissatisfaction as well as corporate complaints to avoid ambiguity to the tenant.

## → Question 7

There are four proposed tenant satisfaction measures under the theme of Effective Handling of Complaints (CH01 Complaints relative to the size of the 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?

### Answer

- Yes.
- No – please explain and provide any alternative suggestions where relevant.

Please tell us if you have any comments on any of the individual tenant satisfaction measures under the theme of Effective Handling of Complaints.

### For information to help you answer this question, see:

- This document page 15
- Consultation document pages 43–47

**Yes**

## → Question 8

There are three proposed tenant satisfaction measures 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?

### Answer

- Yes.
  - No – please explain and provide any alternative suggestions where relevant.
- Please tell us if you have any comments on any of the individual tenant satisfaction measures under the theme of Respectful and Helpful Engagement.

### For information to help you answer this question, see:

- This document page 12
- Consultation document pages 47–49

**Yes**

→ Question 9

For the tenant satisfaction measure relating to satisfaction with the neighbourhood, we have presented a lead 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?

**Answer**

- Yes – I agree with the lead proposal for TP09 which is Satisfaction that the landlord makes a positive contribution to neighbourhoods.
- No – I prefer the alternative option for TP09 which is Satisfaction with your neighbourhood as a place to live – please explain.
- No – I don't agree with either option – please explain and tell us your suggestion for an alternative tenant satisfaction measure.
- I don't think there should be a tenant satisfaction measure about satisfaction with the neighbourhood in the suite of tenant satisfaction measures – please explain.

**For information to help you answer this question, see:**

- This document page 13
- Consultation document pages 49–53

**Yes**

→ Question 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?

**Answer**

- Agree – please explain.
- Disagree – please explain and provide any alternative suggestions where relevant.

**For information to help you answer this question, see:**

- This document page 14
- Consultation document pages 53 & 54

**Agree**

However, we would like to register a comment that there is much more context to the survey outcome performance figure of satisfaction here, as there are a number of variables including the fear/intimidation of reporting ASB, wanting only to act anonymously, wanting to report ASB but then not supporting further action, plus a majority of tenants who will never have cause to report ASB.

On face value the resulting performance against this measure may not always give the full picture and further investigation into performance will be required.

→ Question 11

There are four proposed tenant satisfaction measures 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?

**Answer**

- Yes.
- No – please explain and provide any alternative suggestions where relevant.

Please tell us if you have any comments on any of the individual tenant satisfaction measures under the theme of Responsible Neighbourhood Management.

**For information to help you answer this question, see:**

- This document pages 13 & 14
- Consultation document pages 49–54

**No**

We do agree that the four measures provide a well-rounded view with one exception; that the outcomes of ASB cases should be measured and monitored to provide an additional perspective of performance than just the number of cases raised. This additional measure will place a greater focus on landlords to effectively tackle ASB cases.

→ Question 12A

Please tell us your views on the number of tenant satisfaction measures by selecting one of the following options:

**Answer**

- There are too many tenant satisfaction measures in the suite – please explain.
- There is the right number of tenant satisfaction measures in the suite.
- There are too few tenant satisfaction measures in the suite – please explain.

**For information to help you answer this question, see:**

- This document pages 7 & 8
- Consultation document pages 32 & 55

**There are too few tenant satisfaction measures**

Whilst the TSMs cover a broad range of measures there are still some key landlord areas of responsibility not covered, such as how a landlord's homes meet disability needs, how social mobility is supported to allow tenants to move within a Local Authority area due to a change in circumstances, how landlords support vulnerable households and how a landlord is performing in relation to rent collection.

We also commented that there should be an additional measure recording the outcomes to ASB cases.



→ Question 12B

Do you think there are any tenant satisfaction measures that should be added to or removed from the final suite of tenant satisfaction measures?

**Answer**

- Yes – please tell us what they are and why.
- No.

**For information to help you answer this question, see:**

- This document pages 7 & 8
- Consultation document pages 32 & 55

**Yes**

Whilst the TSMs cover a broad range of measures there are still some key landlord areas of responsibility not covered, such as how a landlord's homes meet disability needs, how social mobility is supported to allow tenants to move within a Local Authority area due to a change in circumstances, how landlords support vulnerable households and how a landlord is performing in relation to rent collection.

We also commented that there should be an additional measure recording the outcomes to ASB cases.

We do not consider that any measures should be removed.

→ Question 12C

Overall, do you think the suite of tenant satisfaction measures works well as a whole in providing rounded information to tenants about their landlord's performance?

**Answer**

- Yes – please explain.
- Partially – please explain and provide any alternative suggestions where relevant.
- No – please explain and provide any alternative suggestions where relevant.
- Don't know.

**For information to help you answer this question, see:**

- This document pages 7 & 8
- Consultation document pages 32 & 55

**Partially**

Whilst the TSMs cover a broad range of measures there are still some key landlord areas of responsibility not covered, such as how a landlord's homes meet disability needs, how social mobility is supported to allow tenants to move within a Local Authority area due to a change in circumstances, how landlords support vulnerable households and how a landlord is performing in relation to rent collection.

We also commented that there should be an additional measure recording the outcomes to ASB cases.

<p>→ <b>Question 13</b></p> <p>Chapter 9 of the consultation document covers some general requirements that apply to all tenant satisfaction measures, which are addressed in more detail in Annex 2 Tenant Satisfaction Measures: Technical Requirements. These include how providers should collect and report the tenant satisfaction measures, 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?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Agree – please explain.</li> <li>• Disagree – please explain and provide any alternative suggestions where relevant.</li> </ul> <p><b>For information to help you answer this question, see:</b></p> <ul style="list-style-type: none"> <li>• This document pages 17 &amp; 18</li> <li>• Consultation document pages 56–60</li> </ul>	<p><b>Agree</b></p> <p>No further comments</p>
<p>→ <b>Question 14</b></p> <p>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?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Agree – please explain.</li> <li>• Disagree – please explain and provide any alternative suggestions where relevant.</li> </ul> <p><b>For information to help you answer this question, see:</b></p> <ul style="list-style-type: none"> <li>• This document page 17</li> <li>• Consultation document page 64 &amp; 65</li> </ul>	<p><b>Agree</b></p> <p>There should be no restrictions to enable a landlord to engage with their tenants in a number of accessible formats, determined by the makeup of its tenants.</p>

→ **Question 15**

Chapter 10 of the consultation document covers some requirements that apply to the tenant satisfaction measures 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?

**Answer**

- Agree – please explain.
- Disagree – please explain and provide any alternative suggestions where relevant.

**For information to help you answer this question, see:**

- This document pages 17 & 18
- Consultation document pages 61–67

**Disagree**

We feel that the minimum sample sizes will fail to gather a breadth of feedback. Therefore, we propose that 20% minimum survey responses will give greater transparency of landlord performance.

→ **Question 16**

We propose to tailor our tenant satisfaction measure requirements for registered providers that own fewer than 1,000 relevant homes. This includes not requiring them to submit tenant satisfaction measure data to the regulator, allowing them to collect and report tenant satisfaction measures annually according to a reporting year other than 1 April to 31 March and allowing them to undertake a census tenant perception survey. Do you agree with this approach?

**Answer**

- Agree – please explain.
- Disagree – please explain.

**For information to help you answer this question, see:**

- This document pages 18
- Consultation document pages 68–70

**Disagree**

The reporting year should be standard from 1<sup>st</sup> April to 31 March to ensure that publication can be unified and those tenants with Landlords of more than 1,000 homes are not waiting for results. This should be a consistent approach for all.

<p>→ <b>Question 17</b></p> <p>Chapter 13 of the consultation document covers our proposed guidance about the submission of information to the regulator in relation to the tenant satisfaction measures, which is set out in more detail in Annex 4. This includes generally not using tenant satisfaction measure 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?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Agree – please explain.</li> <li>• Disagree – please explain.</li> </ul> <p><b>For information to help you answer this question, see:</b></p> <ul style="list-style-type: none"> <li>• This document page 19</li> <li>• Consultation document pages 72 &amp; 73</li> </ul>	<p><b>Agree</b></p> <p>However please list in the guidance (not exhaustive) the sources of regulatory intelligence</p>
<p>→ <b>Question 18</b></p> <p>Do you agree with our conclusions in the draft Regulatory Impact Assessment?</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Yes – please give details. You are invited to include evidence to support your view.</li> <li>• No – please give details. You are invited to include evidence to support your view.</li> </ul> <p><b>For information to help you answer this question, see:</b></p> <ul style="list-style-type: none"> <li>• This document page 19</li> <li>• Consultation document page 74</li> </ul>	<p>Yes</p>

<p>→ <b>Question 19</b></p> <p>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).</p> <p><b>Answer</b></p> <ul style="list-style-type: none"> <li>• Yes – please give details. You are invited to include evidence to support your view. Please do not provide any personal sensitive information in your response.</li> <li>• No – please give details. You are invited to include evidence to support your view. Please do not provide any personal sensitive information in your response.</li> </ul> <p><b>For information to help you answer this question, see:</b></p> <ul style="list-style-type: none"> <li>• This document page 19</li> <li>• Consultation document page 74 &amp; 75</li> </ul>	<p>Yes</p>
<p>→ <b>Question 20</b></p> <p>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.</p>	<p>As highlighted in the Regulatory Impact Assessment the implementation of the tenant perception survey and TSMs will require each landlord to budget and allocate resources to the set up and readiness for data collection. 2022/23 budgets have been set and costs incurred will require offsetting against other priorities.</p> <p>We note that ongoing costs will be significantly less than the initial set up costs but this Council believes that new burdens funding for the first year set up costs would be a welcome support to landlords who will be required to divert funding away from existing services to tenants to fund the change.</p>