



The Regulator of Social Housing's Consultation on Tenant Satisfaction Measures Closing Date – 3rd March 2022

**Q1a. Do you agree that the proposed TSM Standard sets clear expectations for registered providers?**

Agree

The proposed TSM Standard is concise and clear on the expectations of providers. The Standard, as drafted, sets a clear list of requirements to measure against but it does not, in itself, set expectations on quality of service or levels of compliance.

Surveying is a science with ways to bias and influence responses and we recommend that the best endeavours are made to ensure accuracy and consistency across the sector. It is important that we achieve replicable, comparable responses to the TSMs.

A centralised survey delivery method would be preferable to ensure proper governance, assurance and protection for customers as well as comparability in method, incentives etc.

**Q1b. Do you agree that the proposed TSM Standard 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).**

Agree

We agree that the Standard supports transparency about landlord performance on the measures being proposed and will allow for rudimentary benchmarking. It has the potential to support sector-wide learning.

[Saffron](#) and [Eastlight](#) asked their tenant reps about the TSMs and there was agreement that this was a positive approach to take with the right focus.

The TSMs should not be considered in isolation of other performance and satisfaction-based data sets. For example, transactional feedback is also a helpful 'temperature check' of tenant satisfaction and offers valuable real-time service-based information about performance. Eastlight's involved tenants were keen to highlight that the TSMs will need to be seen as one element of customer insight, interpreted in the round alongside additional strands of

customer experience data including wider surveys, operational data, and complaints feedback.

We should not lose sight of the aim of the TSMs . We believe the ‘*so what?*’ questions need to be asked and encourage the RSH to say more about how the data **will actually be used** to drive improvement. For example, how will housing providers be required to demonstrate what they are doing with the feedback they receive from tenants?

**Q2. 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?**

Agree.

There is a risk if RP02 is used in isolation that longer repairs targets are set and TP03 mitigates this risk and prevents ‘gaming’.

We note that collecting data for repairs timescales can be problematic with some based on working days, others on calendar days, what is/is not work in progress, different interpretations of emergency/urgent/routine/outside of scope etc. Achieving consistency as far as possible would be helpful for true comparisons.

We wish to flag a concern that we may miss part of the customer journey with only those who have recently had a repair completed invited to feedback. This excludes those that are currently waiting for a repair that may have been going on for some time to get right.

We are concerned that tenants may not accurately recall the date when their last repair was done (i.e. whether it was in the last 12 months or not). This might lead to inconsistent responses.

TP03 – An alternative suggestion has been made for this question to be reworded to ‘If you were given a timeline for a completed repair by your landlord, was this timeline met? Or, ‘were you kept up to date with the progress of your repair?’.

**Q3. 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 to complete most recent repair.**

**Overall, do you think they give a well-rounded view of performance under this theme?**

Partially

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

RP01 – The guidance says that this will be taken as a snapshot on 31 March to see how the landlord is performing. However, there is a danger that this could drive the wrong behaviour in the sector whereby organisations work towards one end of year target rather than maintaining compliance with the standard on a rolling monthly basis. We wondered if it is better to gather a cumulative performance figure that reflects whether we have met our monthly target. This is information organisations should be monitoring already and would not be too onerous.

RP02 – RPs will have different target timescales. Those who set longer targets might have strong reported performance, masking the reality.

The average time taken to complete a non-emergency repair has been suggested as an appropriate alternative measure. Another suggestion would be to measure providers in the same way i.e. percentage of repairs completed in 7 days, 14 days, 30 days, 60 days, etc.

We also suggest that RSH could include a measure which is the % of jobs completed and closed after the first visit since customer dissatisfaction can stem from delays and lack of communication. This would give a more rounded picture of the quality of the service.

We do not believe that tenants should only be able to express their satisfaction if they received a service in the last 12 months. They should be able to express their opinion regardless of timescales.

We would welcome clarity on whether a defect in a new home is deemed to be a repair or not.

**Q4. 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

**Q5. 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.

**Please tell us if you have any comments on any of the individual TSMs under the theme of Maintaining Building Safety.**

We note that electrical safety checks has been missed off the list and suggest this is included too. We note that whilst it is important to capture information on the main compliance areas, fire and electrical safety checks may have remedial works required as a result of the safety check. So, measuring whether the safety check has been completed is not, in itself, enough without the works being completed too.

Energy efficiency is important to tenants and a TSM on this could be included in his section. A question about damp and mould could also be included.

TP04 should be split into 2 questions with one about the home being well maintained, and The second about whether the home is safe to live in. For the TSM about safety in your home, tenants should be informed of how safety is measured. For example, this question is not about safety in the neighbourhood, crime or fear of crime, which is dealt with further down in the neighbourhood section. [settle](#) reported their experience when they asked this question as part of a 'Big Door Knock' project, residents usually discuss the safety of their neighbourhood or fencing rather than the building and so this question needs to be clear.

If tenants say their home is not safe, then we would need to follow that up urgently. However the questionnaire will be anonymous. Could we ask for tenant details if safety is flagged as an issue during this process?

**Q6. 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 but we believe that this would be better targeted to tenants who have actually used the complaints service, focussing on the complaints process and not the outcome. We suggest it might be better to have a qualifying question about whether they have had to raise a complaint in the last X months and then ask them about the satisfaction with the handling and approach to complaint management. We also note that as drafted, this question does not enable trends in complaints to be tracked, e.g. what the complaint is about.

**Q7. There are four proposed TSMs 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?**

Yes

**Please tell us if you have any comments on any of the individual TSMs under the theme of Effective Handling of Complaints.**

TP12 - We are concerned that tenants may not know the complaint reporting procedure but this is unlikely to prevent them from complaining. If a tenant is motivated to complain then they will find out the procedure and contact us or visit our website which gives information on how to do so.

We note that tenant satisfaction with complaints handling will be influenced by whether the complainant got the outcome they wanted. A satisfaction measure along the lines of “does my landlord take complaints seriously” might be considered alongside recording/reporting of complaints by theme. Another suggestion is ‘how easy is it to find out about your complaints process when you needed to complain’. We also suggest that compliments could be reported giving a more rounded picture of performance.

There is the opportunity for greater reflection of the messaging in Housing Ombudsman’s Complaints Handling Code in CH01. For example, [Estuary](#) raised that in being committed to recognising, recording, and responding to expressions of dissatisfaction as complaints, they may be unfairly disadvantaged in the measure as recommended. An alternative suggestion is the number of complaints resolved at the 1st stage.

**Q8. 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?**

No

**Please tell us if you have any comments on any of the individual TSMs under the theme of Respectful and Helpful Engagement.**

TP05 and TP07 are asking two questions within one, and these should be split (well-maintained AND safe; treated fairly AND with respect).

TP06 – we feel that the question is broad and should be more closely associated with keeping tenants informed about matters that directly affect them such as tenancy issues, rents, help available and our services in general.

Flagship Group consulted a sample of tenants on these TSMs. For TP05, 10% of our surveyed tenants said that they didn't know whether we listened and acted on their views. Therefore this is may be tricky for some tenants to answer.

**Q9. For the TSM 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?**

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**

No – I don't agree with either option – please explain and tell us your suggestion for an alternative TSM.

I don't think there should be a TSM about satisfaction with the neighbourhood in the suite of TSMs.

We suggest that this option reflects the wider perspective of the neighbourhood including the factors which could affect the services we provide. This would also inform a multi-agency response, of which the housing association would be part of, but would not necessarily lead. We believe it would garner more meaningful responses that can drive community action than the lead proposal which may be difficult for an individual tenant to measure / comment on.

We should be mindful that many neighbourhood issues are not within our direct management control. 'Neighbourhood' is a subjective term with some tenants considering it the road they live in, others a small area and others a broader village/town location.

What will people really understand as a 'positive contribution'? This is highly subjective.

Tenants may not necessarily know which agency has responsibility for a particular aspect of the neighbourhood. The subjective nature of neighbourhood makes it difficult to do a like for like comparison of customers responses. We suggest a qualitative focus group would be a better way to approach this issue.

**Q10. 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?**

Disagree.

We suggest that this is a blunt measure for measuring complex issues that can span over a long period. Due to the nature of legal processes/working with the police etc, it may not be possible to share information and updates with those affected and so we need to interpret the results of this with sensitivity, please see suggestions below.

We also note that there is no qualifying question for TP10, asking if a tenant has reported ASB prior to asking about satisfaction with handling. The word 'approach' might be considered abstract when customers are arguably more interested in outcomes.

**Q11. 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?**

Yes it is rounded, but we foresee the following issues with this TSM:

**Please tell us if you have any comments on any of the individual TSMs under the theme of Responsible Neighbourhood Management.**

People's perception of the service is generally influenced by whether or not they got the outcome that they wanted. With ASB, this can be very difficult. We suggest this question should be broken down into more specific areas such as – do you feel your voice was listened to, did your landlord communicate clearly, did you feel supported through the process, were you kept informed about the progress of your case including possible outcomes etc.

NM01 – We need to understand the operating context before drawing conclusions on the amount of ASB relative to the size of the landlord. For example, it would be wrong to compare a landlord who operates in a densely populated urban area to a landlord in a leafy suburb. This question is heavily influenced by other factors such as urbanisation, demographic and crime rates as well as size of stock and so we would need to apply caution in the reporting of this measure. NM01 significantly disadvantages smaller landlords whose portfolio exists within, or in close proximity to areas of high crime.

There is a risk that NM01 could drive the wrong behaviour i.e not opening a case formally.

TP08 – we consider it would be useful to edit this wording as follows: Satisfaction that the landlord keeps *internal and external* communal areas clean, safe and well maintained. This makes it clear that we are talking about more than just interior communal areas, covering grounds maintenance, upkeep of communal garages etc.

TP09 – We agree this is important to understand but is very subjective. What is meant by a positive contribution? Does it mean the contribution we make to enhance the lives of the

people who live there (i.e. the community), or the built and natural environment, or both? We also note that in neighbourhoods where we have a small number of properties, we may be less visible and it could be harder for tenants to see the wider aspects of our work than in areas where we have a larger concentration of stock.

[Estuary's](#) Residents Groups considered this issue and they had a mixed view of the definition of the word 'neighbourhood'. Estuary's tenants agreed that in areas with large concentrations of stock on single-landlord estates, it is valuable to measure tenant satisfaction with a landlord's contribution. However, where there are street properties and scattered stock patterns, this renders the question misleading and to varying degrees, futile.

Both TP04 and TP08 conflate maintenance and safety in one question (albeit about homes and then communal areas).

We do not believe that the scope of this section should include domestic abuse or hate crime which are specialist areas and need to be handled sensitively.

**Q12a. Please tell us your views on the number of TSMs by selecting one of the following:**

There are too many TSMs in the suite

**There is the right number of TSMs in the suite**

There are too few TSMs in the suite

**Q12b. Do you think there are any TSMs that should be added or removed from the final suite of TSM's?**

Yes.

The suggestions made above for re-wording the TSMs, and some more service based questions such as:

How easy is your landlord to interact with?

Do you trust your landlord?

Are you satisfied with the different ways you can access services from your landlord?

Does your landlord meet your needs?

Does your landlord take feedback seriously?

Does your landlord take complaints seriously?

Are you satisfied with the online services your landlord provides?

What one thing would you improve if you could?

Flagship Group tenants suggested including measures about: Complaint resolution time, year on year rent increases, rent arrears, cost of living, energy efficiency of homes. [Eastlight's](#) involved tenants suggested adding questions about decarbonisation, energy efficiency and safeguarding.



Catalyst suggest that there are too many TSMs and ASB and Neighbourhood should be removed.

[Estuary's](#) tenants report that questions which seek to establish whether residents trust their landlord or the ease of access/engaging/communication with them as particularly important.

CHP customers thought that timeliness of repairs could relate to both the time it took to send someone out but also could refer to the time taken to complete the repair so this needs more clarity. They also had lots of questions about the scope of the questions throughout – whether they included contractors, communal areas etc.

Their customers also talked about how they wanted text boxes for each question to explain what they meant, which reinforces their expectation that they would get positive outcomes to their service as a result of the feedback. They talked about using it to choose a landlord and wanting to compare geographically, which supports doing it as a wide exercise by the regulator.

**Q12c. Overall, do you think the suite of TSMs works well as a whole in providing rounded information to tenants about their landlord's performance?**

Yes

**Partially**

No

Don't know

**Q13. 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 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?**

Disagree.

We would like to see more consideration of the option for the RSH to commission this research at the national level and directly handle the data and reporting. This is the approach taken by other regulatory bodies such as Ofsted who directly survey the parents of children in the schools they are inspecting.

This approach would add richness of insight in the sector because the RSH would then be able to 'slice and dice' the data to draw strategic conclusions about housing at regional level, by customer type, by property type, by neighbourhood etc. This would be far more rounded and would have the potential to influence national housing policy if collected for the whole sector. As currently proposed, the data is only available by landlord and the strategic value of this collective dataset is less powerful, or lost altogether.

We also believe that value for money would be greater achieved if this dataset were to be collected by RSH rather than by each individual RP.

**Q14. 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?**

Disagree

Experience tells us that we elicit higher responses when receiving a SMS response, compared to email. Face to face or verbal feedback may be subject to bias.

There should be a defined collection process for all landlords, or a centralised syndicated piece of research. Using different methods will produce different outcomes – there are tenants who are more or less likely to respond to certain methods, and not defining for landlords could:

- Potentially disenfranchise certain groups of tenants
- Over-represent certain tenants
- Reduce comparability of results between providers.
- Result in weaker quality assurance across organisations.

**Q15 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?**

No.

Asking for overall satisfaction at the beginning, rather than end means that it is asked before full reflection on the service. It should be the final question asked. This is standard/best practice survey design.

More detailed guidance on sampling would be helpful. Allowing individual choice on this will reduce comparability of results, and potentially reduce representativeness of surveying. Stratification of population should be defined by the Regulator and not left to the individual choice of providers.

Context from transactional surveys would be beneficial for a more rounded view.

**Q16. 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 to undertake a census tenant perception survey. Do you agree with this approach?**

Agree.

However we do not believe the resource 'problem' relates only to providers with less than 1000 homes. We have smaller providers in BuildEast who currently conduct perception surveys every 2-3 years. They do not have digital platforms and insight staff. Therefore, this new TSM requirement will require new resources for all providers and may be most acutely felt by the smaller ones. Statistical robustness does not favour the smaller providers. Less

resource-heavy survey methodologies tend to produce less favourable responses – in both number and sentiment. Therefore, an organisation undertaking the collection of the measures with methodologies driven by VfM could risk a significant disadvantage.

We therefore suggest that a more nuanced approach to segmenting HAs could be taken, with different requirements according to size, so that there are at least three categories of provider- small, medium and large. This will allow easier comparison between comparable organisations. OR as above, We also believe that value for money would be greater achieved if this dataset were to be collected by RSH rather than by each individual RP.

**Q17. 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.

It is important that this TSM dataset is seen as part of a wider approach to scrutiny and regulation.

**Q18. Do you agree with our conclusions in the draft Regulatory Impact Assessment?**

No. We believe that policy option 4 which is a national tenant survey, deserves greater consideration as the way forwards in line with our commentary under Q13.

**Q19. 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

We would welcome the RSH providing a standard accessible version of the survey for use by all HAs with tenants who require such a version. This would both reduce the resource burden on HAs and, importantly, ensure consistency and direct comparison between responses. If HAs develop their own accessible version of the survey, which will be required to cater for a diverse range of needs, the versions will vary and as such the results will be less reliable when submitted for comparison.

[Orwell](#) reports that their internal research shows that there are a number of tenants who will potentially be disadvantaged by not being heard via traditional surveying methods, and we should be mindful that we do not miss responses from individuals with cognitive difficulties or other conditions or needs that might make them less likely to respond to these surveys. Results will look different for different customer groups.

**Q20. Finally, if you have anything else that you would like to tell us about the proposals relating to the TSMs, including the detailed requirements set out in Annexes 2 and 3, please tell us.**

Thank you for the opportunity to contribute to this important policy development. Our final thoughts are:

- We think the proposed measures cover some of the things that are most important to tenants. The energy efficiency of homes, and the supply of new homes are also important and they are currently missing from this TSM dataset.
- Incentives – these should be modest because incentivising a satisfaction survey may skew satisfaction levels. Perhaps we should incentivise in the same way for consistency.
- More guidance would be helpful for tenants who receive care and /or support and whose survey might need to be conducted in different ways.
- We need to retain the focus of this work being on service improvement. The preamble to the survey should explain that ‘your feedback will help us to improve the services we offer you and provide you with greater transparency and accountability’ rather than to ‘we are carrying out this survey for regulatory requirements’.
- The importance of seeing these ‘in the round’ cannot be overstated. The 22 TSMs need to be considered alongside KPIs which will be bespoke to each Housing Association, and detail performance in line with each organisation’s particular strategic direction and operational focus. The TSMs were, to a degree, seen as a risk as they may drive too tight a focus on too narrow a range of delivery areas for customers.
- The wording of the questions should be ‘checked’ and signed off by behavioural insight professionals to ensure they are worded in the most appropriate way. The ‘satisfaction’ wording may not elicit the most accurate responses, and we would suggest an agree-disagree scale against statements.
- There should be more regulatory oversight of specifics (re. methods, sampling etc) for comparability. Data collection should meet proper governance requirements – Market Research Society Code of Conduct.
- Over time, this will take precedence over the pre-existing surveys that we run and there is a risk that we lose long term trend data.
- We are mindful of ‘survey fatigue’ and that we are less likely to receive a satisfactory return rate if the survey is overly long or repeated too frequently, especially as we would like to continue with some of our transactional surveys at the point of contact as well in order to resolve issues at the time they are identified. Some of our services are CQC regulated, and therefore tenants are asked to complete surveys and returns for that regulatory body too.
- We seek clarity on whether First Homes and shared equity is included in the TSMs?