



## About us

The Northern Housing Consortium (NHC) is a membership organisation based in the North of England. We are the 'Voice of the North' working with councils, housing associations and ALMOs to develop insight, influence and solutions to create better homes and places. Our members own or manage more than 9 out of 10 socially rented homes in the North. Through our work with our members and their tenants, we support their commitment to ensure the safety and decency of social housing. Our response is informed by consultation with our members.

Q1: Do you agree that the proposed TSM Standard

- a) Sets clear expectations for registered providers?

### **Agree**

We agree that the satisfaction measures will help in an assessment of whether landlords are achieving the standard of outcomes required by the new Charter.

- b) 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**

The TSM Standard will provide tenants with reliable, consistent information about the range of services provided by landlords and as part of a new consumer regulatory regime. Our only misgiving would be that the precise detail of that new regime is not fully known and, on that basis, the new measures should be kept under review.

Q2: We are proposing to introduce two TSMs about **timeliness** of repairs (RP02 Repairs completed within target timescale; 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**

We agree with both of the measures – the measure for landlords directly, and the measure through a tenant perception survey.

Our slight reservation on timeliness relates to the significant variation in target timeframes and in the methodology applied by landlords to measure completion times. We support measures to improve reporting in this area and to introduce a level of consistency. Some of our members felt that 'average

days to complete a repair' would be more objective and would account for factors outside of their control and the complexities related to some repair work. Under this scenario, the TP measures would become – “Average length of time taken to complete emergency repairs” and “Average length of time taken to complete non-emergency repairs.”

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; 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?

**Yes**

For the measure to reflect a new Decent Homes Standard various other changes are likely to need to be incorporated into the Standard and this requires alignment with the Heat in Buildings Strategy, fire safety, green energy and zero carbon goals. A new Decent Homes Standard is likely to cause a level of variation to the current reported compliance, and we agree that landlords must undertake to collect robust data on stock quality ahead of changes to the Decent Homes Standard.

In relation to TP02 some of our members have indicated they will continue to use transactional surveys, and this will continue to provide useful data.

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; BS05 Lift safety checks?

**Agree**

We agree that this reflects the importance of registered providers ensuring that these checks have been carried out is clear, and we consider that the proposed approach is consistent with the aims of the White Paper, which emphasises the role of registered providers in supporting their tenants to feel safe.

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; 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**

Registered providers collect this information currently and the set of measures provide a well-rounded picture of performance. Some of our members commented on the impact of a single safety check affecting many homes and the additional costs and complexities of completing health and safety checks however, our members take safety obligations seriously and support the set of measures.

The consultation document makes clear that the precise wording of measure TP04 was given careful consideration but some of our members commented on the assessment of 'well maintained' and 'safe to live in' are two distinct measures in a single question. Some members also commented on the possible addition of a measure for solid fuel checks as this reflects the current situation for many households.

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**

As the consultation paper points out, many landlords will carry out two survey types for perception and transactional, gathering data linked to a recent service while the interaction is still fresh in residents' minds.

Some of our members have indicated they will continue to use transactional surveys and it is likely that many will find themselves in the position where their data from perception and transaction surveys will evolve over time and we anticipate that this will support the data quality overall on service delivery and complaints.

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; 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**

We agree the set of measures give a well-rounded picture of performance.

Some members commented that TP11 has no qualifier in that all tenants are asked to respond regardless of whether they have direct experience of a complaint.

We received comments regarding CH01 in relation to the Housing Ombudsman advice to define a complaint as any expression of dissatisfaction and where these are logged but rectified quickly. A 'level playing field' is

required which should be achieved through providers' compliance with the Ombudsman's Code and then applying the same guidance under this measure.

On TP12 it was felt by some members that tenants' knowledge of how to make a complaint was not necessarily indicative of a well-managed complaints system, as tenants would seek out this knowledge on a need to know basis, as any consumer of a service in the private sector would.

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; 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?

**Yes**

We agree that TP05 that satisfaction with being listened to must be accompanied by taking on board what is said, and being seen to act on it. However, 'listens' and 'acts' are separate responses and some members felt satisfaction with listening - as it supports a relationship of mutual trust - may be sufficient as one measure.

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** – 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.

We understand the rationale for the lead proposal as it is specific to the landlord's contribution to the neighbourhood which separates the role of the landlord in wider neighbourhood issues.

Some of our members felt that the alternative option 'How satisfied or dissatisfied are you with your neighborhood as a place to live?' was a more straightforward measure likely to avoid any misunderstanding of the landlords role. This was felt to be a clearer measure for tenants to be able to respond to.

Also, the lead question is more likely to mask serious problems in some neighbourhoods.

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?

### **Agree**

It is appropriate to focus on the 'handling' as opposed to the 'outcome'. Landlords will need to survey all tenants for this question which could generate misleading information, as it includes people who haven't had experience with anti-social behaviour. Landlords will need to work proactively in encouraging and advising on standards of what behaviour is expected and what behaviour might be considered as neighbourhood nuisance or ASB.

If the question was targeted solely to those tenants with experience of ASB and for whom the landlord had opened an ASB case, this would provide more accurate information on the services the landlord has provided specifically to tackle this issue.

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; 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**

We note in the consultation document consideration has been given to how to measure this and number of anti-social behaviour cases opened was deemed least likely to cause confusion. Some comments we received felt that further guidance was needed to ensure consistency of reporting so that all providers were clear on logging a complaint and an anti-social behaviour case.

Comments were received about TP08 and whether 'Clean,' 'safe' and 'well-maintained' could be measured on one question.

Q12. Number of TSMs

12a) Please tell us your views on the number of TSMs by selecting one of the following options:

- There are too many TSMs in the suite – please explain.
- **There is the right number of TSMs in the suite.**
- There are too few TSMs in the suite – please explain.

12b) Do you think there are any TSMs that should be added to or removed from the final suite of TSMs?

**Yes**

As a tenant perception measure, we would suggest the addition of a measure on Housing Quality: ‘Overall, how satisfied or dissatisfied are you with the quality of your home?’ This could be included alongside other questions about repairs and maintenance.

The quality of homes at the point of letting was felt to be a useful measure, for example, for those who have taken a recent letting within the process of the gathering of each set of survey data, ‘How satisfied or dissatisfied were you with the standard of your home when it was let?’

12c) 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**

It is right that residents have all of the information they need to be able to judge how their landlord is performing. Social housing landlords want to achieve transparency and accountability. We therefore support the objective of a compilation of a set of indicators which address operational efficiency, targets achieved and good customer service. This set of measures, however, does not judge how well residents are being treated by their landlord. Also, there was considerable uncertainty about how residents will make use of the information presented through the measures.

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?

**Agree**

We believe the proposals are proportionate and minimise interference.

We would like to emphasise the need for clear qualifiers within certain measures where all survey respondents are being asked to judge personal experiences without necessarily having experienced the service.

The measure on anti-social behaviour for example and the measure on satisfaction with complaints should be qualified. Also, if there is an addition of a new lettings measure, this should relate to recent experience within the scope of each survey.

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?

**Agree**

We support the requirement for registered providers to publish a summary of the survey method(s) they have used so that tenants would be able to see this alongside the published satisfaction scores. This could include reporting on whether there has been a change to the method used in previous years.

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?

**Agree**

We agree that consistency in question wording is important and that the timeframes are reasonable and proportionate.

As noted under Question 6, we believe there is scope for registered providers to continue with transactional surveys and for these to evolve to support the evaluation of feedback through the perception survey.

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**



We feel this is proportionate and statistical requirements set for the survey data would achieve statistical accuracy.

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**

We agree that TSM information could be used to help the regulator to identify particular areas where further assurance could be sought from a registered provider about meeting standards.

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

### **Yes**

We agree with amending the regulatory framework to introduce TSMs for registered providers as specified in the proposed requirements, with proportionality for smaller providers, and providers choosing their own collection methods for the tenant perception surveys. We agree that many of the benefits of the TSMs are linked to the broader White Paper proposals including to strengthen the regulator's consumer regulatory role. Comparable TSMs should lead to increased transparency about landlord performance for tenants who would more easily be able to compare the performance of their landlord with other providers.

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**

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.

TSM requirements state that the overall satisfaction question to generate the overall satisfaction TSM (TP01) 'Taking everything into account, how satisfied or dissatisfied are you with the service provided by [your landlord]?' must appear as the first question in any perception survey questionnaire used to generate TSMs.

Some of our members took the opposing view of the draft requirements and felt that asking this as the first question would in fact impact on responses for subsequent measures as it lays down an indicator for all of the detailed measures to follow.