

Consultation on the introduction of tenant satisfaction measures

*Response drafted and submitted on behalf of Network Homes' resident
panels*

ABOUT NETWORK HOMES

Network Homes is a charitable housing association driven by social objectives. We own and manage over 20,000 homes across London, Hertfordshire and the South East and we put residents at the heart of our work. As well as managing homes we're also a high quality developer and expert in regeneration.

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Context

The below response to the TSMs consultation was built on discussions held within our resident panel meetings, both in London and Hertford. It was an opportunity for Network Homes' residents to make their voice heard and directly inform the way Government will shape consumer regulation in social housing over the next few years.

The Research and Policy team provided resident panels with an insight into the consultation, giving an overview of the potential impact that the proposed reforms will have on the way social landlords across England – including Network Homes – gather information on tenants' satisfaction and assess their performance against regulation.

We first collected ideas from the two official panel meetings in January, and drafted an outline of key concerns, as well as questions requiring in-depth discussion.

We subsequently held a focus group with three members of the London resident panel in February, and scanned through the consultation main document and attachments, providing a clear answer to the different questions.

The response below is reflective of the opinion of the members of our resident panels. Although the panels, in London and Hertford, only account for a small proportion of our overall number of residents – 20,000 households overall – their function is to represent all our residents and are committed to engaging with Network Homes on a regular basis.

The response has not been influenced by Network Homes staff's views around the forthcoming regulation.

Questionnaire

Q1. Do you agree that the proposed TSM Standard:

a. sets clear expectations for registered providers?

Our resident panel agreed with the Regulator that the proposed TSM Standard sets clear expectations for registered providers. However, concerns were raised with regards to landlords' capacity to collect accurate information from a variety of residents.

They recognised the challenge social landlords might face in getting a sufficient amount of survey responses from a widespread and representative sample of the resident population. In that regard, they support the Regulator's call for social landlords to start planning their survey frameworks ahead of the forthcoming regulation.

They agree with the Regulator that social landlords should trial a variety of sampling methods and surveying channels to make sure the selected sample is as inclusive as possible and accurately reflect the demographic make-up of the tenants, especially with regards to tenure and stock type; age of respondents; ethnicity; building type; and household size.

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)?

Our resident panel welcomed the proposed reforms, emphasising the importance of the wider Social Housing White Paper in seeking to get the balance right in respect to landlords and tenants' responsibilities. They agree with the White Paper's mission to recreate strong connections between the two parties and ensure transparency and accountability at all times.

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?

Yes, overall, the two indicators provide a good balance and allow comparison between landlords' data reporting and residents' actual levels of satisfaction, shading light on any discrepancies that might arise and allowing the Regulator to take action when outcomes are particularly concerning.

Our resident panel raised a few questions around the definition of timeliness, as the concept can vary broadly, depending on the nature of the repair, as well as landlords' approach. Introducing a question on landlords' ability to address repairs 'right first time' should be considered as a potential alternative.

Another option would be to include a question on landlords' ability to communicate proactively with residents around repairs, making sure residents are regularly up to date with ongoing tasks.

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?

Our resident panel stated that the proposed TSMs provide a good mix of:

- number of properties meeting Decent Homes and Good Repair standards, gathered internally through landlords' information management systems; and
- residents' opinions on quality and timeliness of repairs, collected externally through tenant perception surveys.

They agreed with the Regulator that this information should be made publicly available after submission to the Regulator, so that residents are effectively able to assess landlords' performance with repairs against actual levels of tenants' satisfaction, and ultimately hold their respective landlord to account.

Q.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; BS05 Lift safety checks?

Yes, our resident panel agreed with the Regulator's proposal to use individual homes as the basis for Maintaining Building Safety TSMs.

Q.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; 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?

Our resident panel suggested the introduction of a further indicator reporting on energy efficiency of the housing stock, for example asking landlords to provide a breakdown of homes by EPC/SAP bands.

Although there are other methods and platforms to report on this statistics – e.g., SHIFT – including this indicator among the TSMs-based information that landlords are expected to provide annually would make it more easily accessible to residents, increasing overall transparency around energy efficiency reporting.

Q.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?

Yes, our resident panel agreed with the Regulator's proposal to use perception surveys to measure tenants' satisfaction with handling of complaints.

The possibility of asking this question only after a formal complaint has been made was also discussed as an alternative option. However, they agreed with the Regulator that a wider

group of residents should be allowed to have a say on the way landlords handle complaints over time, on the account that greater scrutiny would potentially lead to improved services and communication in relation to dealing with complaints.

Q.7 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, our resident panel agreed with the Regulator that the proposed TSMs give a well-rounded picture of performance under this theme.

Q.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; 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, our resident panel agreed with the Regulator that the three proposed TSMs give a well-rounded picture of performance under this theme.

Q.9 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?

No, our resident panel expressed concerns around the way the question is framed. Levels of satisfaction/dissatisfaction with the wider neighbourhood are often influenced by location-specific factors, something that landlords are not necessarily in control of.

They would like more clarifications around the definition of neighbourhood in this particular instance, as it is not clear whether the proposed TSM refers to communal areas – directly managed by landlords – or instead other elements which require intervention from other players, e.g., the local council would be responsible for maintenance of street lighting.

Q.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?

Yes, our resident panel agreed with the Regulator that anti-social behaviour (ASB) can sometimes be an element affecting quality of life within communities and therefore requires monitoring.

They discussed the extent to which a landlord should be deemed responsible for how ASB is handled within a certain neighbourhood, recognising landlords' limited control over ASB in several circumstances.

However, they would expect landlords to take on an active role in engaging with other institutions – local councils, police etc – around potential ASB concerns.

Q.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; 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?

Our resident panel would like more clarifications around the definition of neighbourhood in this particular instance, as it is not clear whether the proposed TP09 refers to communal areas – directly managed by landlords – or instead other elements which require intervention from other players, e.g., the local council would be responsible for maintenance of street lighting.

Q.12 Number of TSMs

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

There is the right number of TSMs in the suite.

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

Our resident panel suggested the introduction of a further indicator reporting on energy efficiency of the housing stock, for example asking landlords to provide a breakdown of homes by EPC/SAP bands.

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?

Yes, the proposed TSMs provide a good mix of internal data – gathered from landlords' information management sources – and residents' opinions – collected through tenant perception surveys.

Q.13 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?

Yes, our resident panel agreed with the Regulator's proposals as set out in Chapter 9 of the consultation document.

Q.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?

Yes, our resident panel agreed with the Regulator that landlords should be given flexibility with regards to survey collection methods in order to engage with a wide variety of households – by tenure type, age, ethnicity, household size – and make sure the surveyed sample is as inclusive and representative of the tenant population as possible.

Furthermore, relying on different collection methods would guarantee a higher response rate, with residents having the chance to choose among different channels to answer the survey. This approach would also ensure that residents with no access to the Internet service are not left out, giving them the opportunity to rely on a different method.

Q.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?

Yes, our resident panel agreed with requirements in Chapter 10.

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

Yes, although this question does not apply to Network Homes, our resident panel generally agreed that registered providers that own fewer than 1,000 relevant homes should be granted more flexibility with data collection and submission, in line with capacity and constraints around resources.

Q.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?

Yes, our resident panel agreed with the Regulator that analysis of TSMs information for regulatory intelligence should be run alongside the wider set of statistics and information that landlords are required to submit to the Regulator. This approach would provide the

Regulator with a well-rounded picture of how a landlord is performing against a much wider set of parameters and obligations.

Q.18 Do you agree with our conclusions in the draft Regulatory Impact Assessment?

Yes, our resident panel are aware of the key points of the draft Regulatory Impact Assessment and agreed with the conclusion, i.e., choosing Policy 1 as the lead option.

Q.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, our resident panel agreed with conclusions in the draft Equality Impact Assessment. They emphasise the importance of reaching out to a sample of residents which is reflective of the wider demographic make-up of tenants, making sure people who share one or more protected characteristics are effectively and proportionally represented within the surveyed sample.

Q.20 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.

No, our resident panel had no more to add.



For more information, please contact:

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