



Regulator of
Social Housing

Rectangular Snip

A3 Are you answering:

- Individually
 On behalf of an organisation

A4 What is the organisation's name:

Councils with ALMOs Group

A5 Please give a summary of the people and organisations your group represents and where relevant, who else you have consulted in writing the response?

Councils with ALMOs Group (CWAG) represents stock owning local authorities where council housing is managed by ALMOs. There are currently 25 local authorities that are members of the group which is also a Special Interest Group of the Local Government Association.

A6 Are you a:

- A social housing tenant in rental accommodation
 A shared owner with a registered provider
 A private registered provider
 A local authority registered provider
 A stakeholder organisation
 Other

Q1a Do you agree that the proposed TSM Standard:

sets clear expectations for registered providers?

- Agree
 Disagree

Q1b 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
 Disagree

Please explain and provide any alternative suggestions where relevant:

We do think the TSMs will provide insights into landlord performance and also recognise that tenants may find the information useful in comparing their landlord with others. However, the data is very high level from a tenant perspective. It could be argued this undermines the primary objective of providing greater transparency on landlord performance in a way that is meaningful to 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
 Disagree

Please explain:

Questions are framed to include only respondents who have received a repair within the last 12 months – responses outside these parameters are excluded. Recent enough for tenants to have a relatively clear view of the repair from end to end i.e. from reporting to conclusion, therefore if the issues has not been satisfactorily resolved, this should be picked up?

Screenshots of CWAG Consultation Response – Tenant Satisfaction Measures – March 2022

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?

- Yes
 No

Please explain and provide any alternative suggestions where relevant:

The theme here is keeping properties in good repair – in our view, one TSM on timeliness of repair doesn't necessarily provide an adequate proxy for this.

There is a concern that perception surveys may pick up dated, inaccurate or subjective views on quality of repair and other technical issues, giving a distorted picture of landlord performance.

This is in part a technical issue as it should be possible to benchmark against an actual required standard which is not necessarily adequately dealt with purely through this question and tenant perceptions.

One suggestion is to include an independent view on performance and triangulate data on keeping properties in good repair by using data from the English House Condition Survey. Data from the English House Condition Survey would offer a broader independent perspective on stock condition, providing an independent check to balance results based on perception data alone.

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

The focus on perception surveys may result in a significant expansion in the data collected by landlords as they seek to demonstrate their actual performance, pre-empt potential criticism and counter any anomalies that may arise from perception surveys.

Some CWAG members also felt that transactional surveys are a better option for evaluating performance on repairs.

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
 Disagree

Please explain:

Whilst we agree with the proposal to use individual homes for calculating these TSMs it would be useful to include a clear instruction in the definition around empty properties. Similar data on gas safety is currently collected by Housemark but only properties that have a tenant are included in the definition, empty properties are not. The technical guidance may need expanding to ensure housing providers are submitting the same information.

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
 No

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

Although the TP04 does include a framing question ('Thinking specifically about the building you live in, how satisfied or dissatisfied are you that [your landlord] provides a home that is well maintained and safe for you to live in?') some CWAG members expressed concern that the perception question should be more tightly defined to ensure the respondent understands this question relates to the physical safety / maintenance of their building only and not issues originating in the wider neighbourhood which could impact on how safe they feel e.g. ASB.

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
 Disagree

Please explain and provide any alternative suggestions where relevant:

Feedback from CWAG members raised concerns about relying on perception questions under this theme as many tenants will have no direct experience of their landlords complaints handling thus limiting the relevance of TP11. Including a separate measure based on transactional surveys would provide additional context for the perception questions.

Screenshots of CWAG Consultation Response – Tenant Satisfaction Measures – March 2022

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
 No

Please explain and provide any alternative suggestions where relevant:

Combination of CH01 /CH02 actual data with perceptions data does provide contextualised picture of performance but this could be improved by the addition of transactional data from those with recent direct experience of making a complaint.

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

In terms of TP12, in general people don't tend to know the details of how to complain until they encounter an issue where they need to know / find out. The key issue is whether there is an understanding of where to access this information should it be required. The parallel could be drawn with the utility companies or the banks where correspondence / websites etc flag up links and where to access

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?

- Yes
 No

Please explain and provide any alternative suggestions where relevant:

CWAG members are keen to drive forward the cultural reset highlighted in the White Paper and gain a better understanding of tenant experiences and how landlords are perceived. However, there are concerns that the questions underpinning these TSMs are highly subjective and difficult to interpret without further follow up questions and context. It is therefore difficult to anticipate whether the result will be 'a well-rounded picture of performance under this theme'

Given these concerns, CWAG members suggested that it would be useful to gain a better understanding of these and other TSMs by running the initial year (2024) as a pilot. This would allow the effectiveness of the TSM suite to be evaluated and any problems and anomalies ironed out.

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.

Please explain:

The alternative option is preferred as it focusses on tenant satisfaction with the area and better reflects that a number of different agencies have a role in delivering neighbourhood management. It isn't realistic to expect tenants in general to have a detailed understanding of the neighbourhood management arrangements in their area and the potential or actual role of their landlord (and other agencies) in this.

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
 Disagree

Please explain and provide any alternative suggestions where relevant.

Most tenants will not have direct experience of their landlord's approach to anti-social behaviour so a universal question on this may be problematic. The argument that many tenants will have a view even if they don't have direct experience doesn't take into account the complexities and wider involvement of a number of agencies which the tenant may not be aware of.

Transactional approach may work better on ASB.

Screenshots of CWAG Consultation Response – Tenant Satisfaction Measures – March 2022

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
 No

Please explain and provide any alternative suggestions where relevant.

NM01 doesn't give any context about the impact of stock location on the number of ASB cases.

Q12a 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
 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 to or removed from the final suite of TSMs?

- Yes
 No

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

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.

Having reviewed the various annexes to the consultation CWAG members felt that it is difficult at this stage to indicate full agreement or otherwise to the proposals. Much will depend on working through the technical details and implementation issues. We feel that it would be very helpful to run the initial year as a pilot to allow an opportunity for learning without the prospect of full publication and regulatory scrutiny. This would allow for the methodology to be tested, problems and anomalies addressed. There may also be a case for the core TSMs to be considered alongside a range of other data, including transactional surveys and wider performance data to achieve the transparency envisaged in the White Paper.