

Consultation on the introduction of tenant satisfaction measures

National Housing Federation submission in response to the Regulator of Social Housing

Summary

The National Housing Federation (NHF) is the voice of housing associations in England, representing almost 800 housing association members that provide homes for around six million people.

Housing associations are committed to providing safe, quality homes and services for all residents. We welcome this consultation and the opportunity to respond to the proposals for a set of tenant satisfaction measures that will apply to the housing sector.

Our views on the consultation proposal can be summarised as follows:

- We support the Social Housing White Paper and stronger consumer regulation, and are already working with our members to address questions about the transparency and accountability of our sector.
- We welcome the consultation and we support the principles and the intent behind the measures. We agree that tenants should have access to information that shows how their landlord is performing on the issues that matter to them and can help them hold their landlord to account.
- Taken as a whole set, we believe the measures cover the issues that are important to tenants and will aid the regulator in their work on consumer standards.
- We welcome the proportionate approach proposed for providers with fewer than 1,000 homes but are concerned about how these measures will apply in some settings, particularly in supported housing.
- We are concerned about some of the measures proposed in the consultation, in particular on antisocial behaviour and contribution to the neighbourhood, and offer alternative suggestions where we can.
- We believe that some flexibility on how data is collected is helpful, but on balance we think a more consistent approach would aid transparency for tenants and ensure any inevitable comparison between landlords is as meaningful as possible.

Introduction

Our response to this consultation has been informed by the view of our housing association members, and in turn the views of residents who live in housing associations that have been shared with our members.

Housing associations are committed to providing safe, quality homes and services for all residents and we welcome this consultation and the opportunity to feed into the development of the tenant satisfaction measures (TSMs).

As sector, we are committed to being more transparent and accountable to our residents. We support the introduction of stronger and more proactive regulation, alongside other measures in the Social Housing White Paper. We welcome the opportunity to work collaboratively with the regulator to ensure residents receive a high-quality service.

We believe the timely introduction of TSMs will not only be useful for the regulator and provide information to help tenants hold their landlord to account, but will also help the sector identify areas where they can improve.

We are committed to doing more to make sure residents' views and concerns are heard and acted on. We are working to ensure we are providing the services that residents expect from us, and that our complaints procedures and repairs services are responsive and high quality. That is why the NHF set up [our Together with Tenants initiative](#) in 2018 and updated [our Code of Governance](#) to better reflect the importance of tenant engagement and accountability. Together with Tenants is a sector-wide initiative focused on strengthening the relationship between residents and housing associations. It sets out a series of high-level commitments that define what a resident can expect from their housing association, regardless of who their landlord is. Since its introduction, over 200 housing associations, accounting for 83% of all homes owned by housing associations, have adopted Together with Tenants.

We support proposals in the Social Housing White Paper for stronger and more proactive consumer regulation. While we recognise that the TSMs will be one element of the new consumer regulation regime, the measures will provide an opportunity for housing associations to compare their performance and ensure they are delivering what residents expect of them.

We agree with the recommendations in the White Paper that the TSMs should provide meaningful information to residents about their landlord and aid the work of the regulator on consumer standards. However, we think it is critical we listen to residents about whether the measures in the consultation are meaningful for them and would genuinely help them hold their landlord to account.

Draft TSM standard

We agree it will be helpful to have a TSM standard which sets out clear expectations for housing associations in how they should collect and report the TSMs. We believe regularly publishing TSM data on a comparable basis will help enable landlords, tenants and the regulator to better understand how housing associations are

performing on a range of issues.

Later in this response we share our view on the balance between perception and transaction measures and flexibility and prescription in the way measures are collected. These issues will influence the final requirements that are set out by the regulator on how the measures must be collected and reported and we would welcome the opportunity to work closely with the regulator to develop these requirements in more detail in due course.

Proposed measures

The NHF and our members are keen to work closely with the regulator in delivering the TSMs and ensuring they make a meaningful difference to residents.

We believe the measures as proposed cover the right themes and our members have shared that residents have also said they broadly measure the issues that residents are interested in. We know the regulator is seeking input directly from residents. It is important that residents' views are central to arriving at a final position on what we collect, how we collect it, and how it is reported.

The measures are positively focused on critical issues such as effective complaint handling and keeping properties in good repair – however, we think there is a measure missing on landlord's accessibility to tenants. Our members support the addition of a perception measure concerning how easy residents find it to approach their landlord¹ or a question that indicates whether tenants know who to contact if they have any issues.

While we agree it is important to include management information and satisfaction measures, the proposed measures rely heavily on overall perception. The sector extensively uses transaction surveys to identify areas of improvement and gaps in delivery services. Linking perception measures to action outcomes poses challenges.

Many of our members have said they will need to continue to collect transaction information alongside any perception information introduced through the TSMs. This could lead to confusion for tenants and detract from the overall aim of improving transparency and accountability for residents. We would therefore encourage the regulator to review the balance between the perception and transactions measures to ensure they provide a meaningful accurate picture of performance. We have suggested where we think there are issues that could be better measured by a transaction later in our response.

Effective complaint handling

Some of our members thought a transaction measure would be a more suitable means of assessing how a landlord deals with complaints and would give a better picture of the outcome for residents. Many residents will not have used a landlord's complaints

¹ Suggested wording: How accessible is your landlord?

process before, so without a qualifying question, there is danger that asking about satisfaction with the landlord's approach to complaints will not provide a meaningful response.

On balance, we think changing this to transaction measure or rewording the question to ask, 'how confident are you that your landlord would take your complaint seriously and deal with it effectively,' taken alongside the measure on 'tenant knowledge of how to make a complaint' would provide a more meaningful response.

It also worth considering whether the number of complaints relative to the size of the landlord is a meaningful measure and what insight it provides. A high number of complaints could be viewed positively, for example, indicating that the complaints process is accessible and tenants feel confident to approach their landlord or the landlord is actively encouraging complaints. We believe the outcome when a resident does complain provides a more meaningful measure.

Keeping properties in good repair

Some of our members felt there was a missed opportunity to include a measurement on effective communication. The timely resolution of a repair in combination with consistent communication is important to residents. A perception measure seeking to assess how well informed tenants were kept about the status of their repair would be welcome in reflecting this as a key priority for residents.

It is also worth considering what is in scope when referring to repairs. For example, there may be some circumstances in which a tenant requires complex repairs and, due to their nature, will take longer than average. We would welcome the opportunity to work with the regulator to agree a definition for this measure that will provide meaningful information for residents and landlords.

Maintaining building safety

Residents have told us and our members that building safety is a critical issue for them, and we believe it is right to include measures on building safety. Nevertheless, in the interest of avoiding duplication it is worth noting that some of the measures are already required to be reported on against the Decent Homes Standards.

Our members strongly agree that homes should be well maintained and safe to live in, but there is some concern that the associated perception measure conflates two points and could result in ambiguity of responses. Consequently, landlords will not be able to differentiate whether they are being told that homes are not safe or not well maintained. Testing of the earlier TSM metrics included in the Social Housing White Paper showed that when tenants were asked three different questions around the condition of their home, 68% of tenants agreed their home was well maintained, 75% were happy with the overall condition of their home and 86% felt safe in their home. This demonstrates the potential sway a way a question is worded can have on the response rate of satisfaction.

We suggest the regulator seeks to separate the two measures to ensure data can be clearly interpreted. The measure should also be framed more clearly to ensure responses are specifically in connection with the maintenance and safety of a building

residents live in to avoid taking into account external factors such as neighbourhood.

Respectful and helpful engagement

Housing associations are committed to ensuring all residents are treated with respect. The sector continues to demonstrate this commitment, and readiness to listen and address the concerns of residents, through our work on Together with Tenants.

The proposed measures will positively aid landlords in genuinely understanding how residents feel about their interactions with their landlord. We have heard that residents think these measures cover the issues that matter to them but are concerned about the subjective nature of some of the measures. For example, whether a landlord treats tenants fairly and with respect will mean different things to different residents.

Responsible neighbourhood and management

It is important to consider the impact that context will have on issues like antisocial behaviour and how people feel about their neighbourhood.

We believe that antisocial behaviour cases relative to the size of the landlord should not be included in the measures. We appreciate that antisocial behaviour is an important issue for residents and we support the inclusion of a perception measure on antisocial behaviour. However, the number of cases is heavily influenced by context and we do not believe this provides any meaningful information about the performance of the landlord. We are also concerned that publishing information like this has the potential to entrench already deep-rooted stigma about some places and communities.

Our members are also concerned with the wording of the perception measure relating to antisocial behaviour. Antisocial behaviour is a complex issue and resolving cases often requires the involvement of a number of organisations including local authorities, police and other agencies.

Although landlords will have antisocial behaviour policies and will do everything they can to resolve and prevent antisocial behaviour, it is important to acknowledge that their powers are limited. In some antisocial behaviour cases, resolution can be difficult to attain and in other cases impossible – for example, where tenants may be reluctant to report antisocial behaviour.

We urge the regulator to consider an alternative way of measuring how tenants feel about antisocial behaviour in a way that is both meaningful to residents and reflects the contribution the landlord is able to make, ensuring the focus remains on issues that housing associations are directly accountability for. Alternative wording could also help address concerns by focusing on what the landlord is doing about antisocial behaviour and ensuring they are being transparent about the actions they are taking. For example, asking tenants ‘how satisfied or dissatisfied are you that your landlord is taking a proactive approach to tackling anti-social behaviour’ signals an operational focus on providers taking visible action to resolve antisocial behaviour.

The impact housing associations can make to their neighbourhoods varies hugely across the sector. Neighbourhoods can be impacted by external factors that landlords have no control over, such as social or economic issues. How a tenant feels about

their neighbourhood may be the result of a whole host of issues that are unrelated to their landlord.

For some smaller or more geographically dispersed landlords, their opportunity to have an impact on a neighbourhood will be limited. In some cases, a neighbourhood may consist of more than one housing association, complicating the ability to measure the impact of each provider. For example, a small housing association operating as a minority landlord in many neighbourhoods across Wirral owns 70 homes where the largest share is owned by a housing association with 800 homes. The impact on their neighbourhood would be difficult for tenants to disentangle and the actions of larger players will set the tone for the neighbourhood.

In addition, the measure relating to how satisfied a tenant is on the contribution a landlord is making to neighbourhood is open ended and can leave a lot of room for interpretation. Without asking a number of follow up questions, it would be difficult to ascertain the reasoning behind the response, therefore making the data less meaningful. The term neighbourhood also presents some challenges as its definition can vary for depending on different provider and tenant perspectives.

We acknowledge that this is important to residents, but we do not think that there is a question that would accurately reflect the contribution of a landlord to a neighbourhood. We therefore believe this measure should be removed from the set of TSMs.

Fewer than 1,000 homes

We welcome the acknowledgement from the regulator that there should be a proportionate approach for smaller housing associations. Our members who provide fewer than 1,000 homes are committed to being open and transparent about their performance and improving accountability for residents, and support the tailored approach set out in the consultation.

We welcome the proposal that housing associations that own fewer than 1,000 relevant homes would not be required to submit data to the regulator on an annual basis. We believe this approach is proportionate in mitigating the concerns of smaller housing associations in meeting the administrative and resource burden required to meet the TSM standard.

The limited capacity of some of the smallest housing associations will impact their ability to carry our large-scale surveys and, with smaller samples likely to lead to survey fatigue, some of our members are concerned about how they might justify a lower response rate over time. Our members with fewer than 1,000 homes therefore welcome the proposal that they will only be required to collect perception survey data every two years.

Some smaller housing associations noted that not all data would be relevant to their organisations and would welcome the opportunity to tailor the survey to their specific circumstances. In this case, smaller housing associations would provide evidence of where they do not think measures would be relevant or meaningful.

Supported housing

It is important to consider how the proposed set of measures will apply in different settings, particularly in supported housing. Our members who provide supported housing offer a range of services to various groups of residents. This can range from a specialist organisation working with one client group to an organisation that works with a large group of residents with different needs. Any methodology applied needs to be appropriate to residents across supported housing and should seek to facilitate resident led participation.

Our members are committed to collecting data that supports the aims of improving transparency and accountability and show how they are performing on a range of critical issues. However, for supported housing providers, demonstrating they are meeting the standards is likely to be complex and unhelpfully burdensome on residents.

We need to ensure the measures are relevant and meaningful in these settings and can be collected by supported housing providers. For example, questions about neighbourhoods may not feel relevant to residents who do not consider where they live to be their permanent home. Questionnaires may be unsuitable for some people with a learning disability, though they may be able to respond through a face to face discussion.

Supported housing providers may also be challenged in attaining high levels of participation from residents who only stay with them a short time and may have a limited interest in the organisations' long-term objectives. Due to the nature of some supported housing schemes, our members are also concerned about the measures on antisocial behaviour.

We therefore ask the regulator to work with us and our members to establish a system of implementing the TSM framework in these settings, in a way that is meaningful for residents and workable for providers.

Methodology

We agree that the tenant perception survey requirements should establish a basis for generating robust comparable data. We therefore support the proposal that providers use an 'agreed' set of prescribed wording and response options for each survey question specified by the regulator.

We also welcome the ability for providers to include other questions in the same survey as it enables providers to continue with existing mechanisms of data collection that their residents are accustomed to, is helpful for managing performance, and helps minimise survey fatigue.

We support the proposal that housing associations should publish a summary of the methodology they have used to generate perception data, but we are conscious that the method in which the TSM data is collected is likely to play a significant role in

shaping the results. Given that TSM data will be made publicly available, there is a high probability that this will result in the publication of league tables – it is therefore important to have a consistent approach and ensure comparison between landlords is as meaningful as possible.

We are worried that, if differences in performance can be explained by differences in the way the data is collected, this will not achieve the desired transparency for residents. For example, a housing association's independently conducted customer experience survey measuring overall customer satisfaction showed a score gap of 14.6% points between online and telephone surveys. Some smaller housing associations will have limited resources which restrict the type of survey methodology they are able to use, affecting results and potentially response rates.

We acknowledge that flexibility that allows housing associations to conduct the survey in a way that works for them and their residents is usually to be welcomed. However, on balance we support an approach where there is more consistency in when and how the data is collected, for the reasons we have outlined above.

As set out earlier in our response, we also think that careful consideration needs to be given to a more tailored approach to how surveys are conducted in supported housing settings, alongside which measures are relevant and meaningful to collect.

Our members would welcome an initial pilot of the TSM standard to identify and iron out any conditions that could lead to an unlevelled playing field and many have offered to join a pilot along these lines.

Conclusion

In our response, we support the Social Housing White Paper and stronger consumer regulation. We welcome the consultation seeking views on the regulator's proposal for TSMs and support the measures overall, but have set out some suggested changes to ensure the measures are meaningful and support the aims of increasing transparency and accountability for residents. We also welcome an opportunity to explore in detail with the regulator tailored arrangements for supported housing providers in meeting the TSM framework.

We look forward to working with the regulator and in partnership with our residents to further refine and implement the measures over the coming years.