



Consultation on the introduction of tenant satisfaction measures – Wandsworth response

3rd March 2022

Dear Regulator of Social Housing

Thank you for the opportunity to respond to this consultation. Please see below our response on behalf of Wandsworth Council. As a stock holding Local Authority with over 35,000 tenanted and leasehold stock, we look forward to the outcome of the consultation and embedding these measures into our housing services.

For any queries or follow up questions, please get in touch with Wandsworth’s Housing and Regeneration department through michael.liu@richmondandwandsworth.gov.uk

Regards, Wandsworth Council

1. Do you agree that the proposed TSM Standard

a) sets clear expectations for registered providers?

Agree

We would encourage greater clarity of the relationship between the proposed TSMs and the measures used in meeting the other Consumer regulatory standards (and any future revisions to it) for example how the measures in this regulatory standard interact with performance indicators for anti-social behaviour in the Neighbourhood and Community standard and for resident engagement in the Tenant Involvement and Empowerment Standard.

In addition, to minimise replication of reporting and consistency of data, we will look forward to the Regulator’s guidance on the submission of this information and that the information and timescales aligns with other Regulatory requirements, such as our annual reporting of results to tenants.

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

2 – TSMs about timeliness of repairs (RP02 Repairs completed within target timescale and TP03 Satisfaction with time taken to complete most recent repair)

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

Wandsworth already ask measures TP02 and TP03 through both our perception survey and transactional repairs survey.

We would welcome transparency and guidance around the repairs target setting processes so that benchmarking is fair and consistent between landlords.

3 – 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?

Please tell us if you have any comments on any of the individual TSMs under the theme of Keeping properties in good repair.

Yes

Although we agree that it gives a well-rounded view of performance overall, all results would be greatly enhanced if there was an opportunity to explore yes/no survey answers in further detail. Currently, to gain further insight into responses, our surveys ask 'why do you say that' where residents are dissatisfied. Whilst these are more difficult to code and analyse, without them the responses give very little insight into reasons for satisfaction or dissatisfaction. For example, a selection of reasons for dissatisfaction for repairs may be given, such as time taken, quality, conduct, information received etc.

4 – Maintaining building safety TSMs BS01-BS05

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

However, this may also be an opportunity to highlight the importance of Electrical Safety –if it was mandated, alongside a legal basis to enter properties for electrical inspections, it would provide an important tool for landlords in ensuring building safety.

In addition, gas safety checks and other internal checks for leasehold properties are not possible under existing legislation. Although leasehold properties do not count as relevant properties for the purposes of TSMs it may not give an accurate reflection of building safety if leaseholders do not have the same requirements in their lease. For example, we can be 100% compliant in a block but will not know the condition of the leasehold properties that might make up a substantial proportion of the block.

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?

We would note for TP04 that it may not be appropriate to combine satisfaction with building maintenance with satisfaction with safety. This may result in resident responses focussing on maintenance issues that do not affect safety, potentially leading to high levels of dissatisfaction where there are no safety concerns.

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?

Agree

These measures are currently asked by us and reported through resident communications (such as our Area Housing Panel annual reports and through our website) and the annual report to residents.

We would like to note that, by measuring through a perception survey, respondents who have not been through the complaints handling process will be asked to give their views. This may not provide an accurate reflection on the complaints experience. An additional question, 'have you complained to your landlord in the last 12 months' would inform the responses to TP11 and TP12

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 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

We agree with using and working towards the timescales from the Ombudsman Code, however Wandsworth's timescales go further or there are major differences, for example, Wandsworth will use two working days to log and acknowledge a complaint rather than the Housing Ombudsman's suggested five and 20 working days to respond at stage 1 (rather than the HO's recommended 10). We also operate a two-stage process rather than the Housing Ombudsman's suggested three. Our housing department follows the Council's 2 stage corporate complaints procedure as published on our website. Complaints timescales therefore have to be consistent with that process, in line with all other parts of the local authority and these timescales have been agreed with the Housing Ombudsman. This may however, lead to misleading comparisons as the timescales for only two stages will not directly mirror other organisations.

We would also note that this measure doesn't link satisfaction with outcomes. A suggestion may be that this question is split into satisfaction with how your landlord deals with complaints (i.e. the process) and, if used during the last 12 months, satisfaction with the outcome of your complaint during that time.

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 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

We agree that these measures focus on providing insight under the themes of treating residents with respect and listening to residents.

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

We prefer the alternative option for TP09 which is Satisfaction with your neighbourhood as a place to live.

It may be difficult to define a landlord's 'positive contribution'. This is because it may be too broad for a respondent, who will have to evaluate the range of neighbourhood services (for example, such as anti-social behaviour management, cleaning, contractors, estate services, landscaping and improvements) and give a subjective assessment from that which measures 'contribution'. We believe that 'Satisfaction with your neighbourhood' provides a better measure of the resident's feeling of their neighbourhood at the time of asking.

10 – TP10 Satisfaction with the landlord's approach to handling of anti-social behaviour
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

However, by measuring through a perception survey, its' non-transactional nature does not provide an accurate reflection on ASB management processes. An additional question, 'have you reported ASB in the last 12 months' would inform the responses to TP10.

We believe Domestic Violence and Abuse should not be grouped in with ASB (as set out in the technical requirements). The Domestic Abuse Housing Alliance (DAHA), in which Wandsworth are an accredited member, recommends moving away from categorising as ASB. Currently, some organisations do not collect DVA as part of the NM01 measure so there will be inconsistency between organisations.

11 – TP10 Satisfaction with the landlord's approach to handling of anti-social behaviour
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?

No

We note that the technical requirements for NM01 is to only record reports from rented and low-cost home ownership properties. This would exclude leaseholder complaints from the data, approximately 50% of Wandsworth’s stock. We acknowledge the need for consistency with the other TSMs (which is to only report rented and low-cost home ownership), but for ASB, where leasehold reports may be of a communal nature, the figure reported for NM01 would not be meaningful.

We do not feel this provides a reflection of a resident’s expectations in relation to ASB case management or gives a view to the type of ASB that the organisation is managing. ASB performance indicators such as satisfaction with case handling, time to respond, satisfaction with the outcome of their case are more reflective of a landlord’s performance with managing ASB. A further useful measure would be finding out if residents are aware of what landlords can and can’t do in relation to managing ASB, with further detail split into ASB types, such as noise, environmental, communal areas, and so on.

12 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.

We are currently collecting and making publicly available the majority of these TSMs, alongside other indicators, through our annual perception survey. We currently work with an external provider in producing these surveys so Wandsworth will be well-placed to adopt these measures.

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

Yes

We are mindful that the theme of ‘respect’ especially as asked through measure TP07 may be the most difficult to quantify and be the most open to subjective responses. The other measures in the TSM suite will be relied upon to assess how fairly we treat our residents and how well we listen and respond to them.

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?

Partially

Because of the focus on themes of ‘Respect’, the TSMs lean heavily on perception rather than a focus and analysis on case management outcomes and performance. Positive results and good scores can be achieved through good communication strategies, customer contact and information. Whilst this isn’t a drawback as a whole, the risk is that this is at the expense of focussing on effective and efficient front-line performance.

The other issue is the potential variables in methodology in both survey collection methods (see q14) and the differences between landlords (for example, inner city versus rural, differences in stock and size) which may affect results and give residents misleading benchmarking comparisons.

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?

Agree

We understand the context of the TSMs and its focus on social rented and low cost home ownership properties. However, this excludes a significant proportion of Wandsworth's stock. We would continue to include leaseholders within our own surveys to ensure that they can feed back and are listened to .

As a local authority, we work with other housing providers in our borough, for example, for the purposes of planning and development and community safety. We would like to consider a requirement for housing providers to report on individual LA areas and neighbourhoods. For example, an advantage of seeing the TSMs by local area is that if a large housing association landlord has property in both London and Midlands, some measures, if taken overall, would be less meaningful to someone from the other part of the country. For an issue such as ASB, these differences will be especially pronounced where urban areas are compared to, or averaged out against other areas of the country.

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?

Agree

However, the results need to be presented in a way which is reflective of the methods used.

Landlords should be required to be transparent about their collection methods and the requirements should go further than simply publishing an explanation of methods used - there should be a requirement to either use weighted formulae or not, which is adopted by all.

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?

Agree

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?

Agree

As a Local Authority, we will need this information to work with the small providers in our area. Ideally it would be consistent with our methods and timetable to ensure that fair benchmarking comparisons are made.

We would also require consistency of achieving the required sample size for all landlords to adopt regardless of size. For example, Wandsworth will recruit a new set of respondents for each survey rather than use an established ‘panel’ but recognise this may be more difficult for smaller providers

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?

Agree – no change

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

Yes

19 – Draft Regulatory Impact Assessment

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 surveys aim for a representative sample and we will use a range of survey methods to ensure this. However, we acknowledge that some demographic groups may submit more feedback than others, meaning that some groups may be more represented than others and reaching unrepresented groups, for example, increasing access through translation and interpreting services attach additional resource.

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.

Overall, Wandsworth already undertakes and reports on satisfaction surveys that cover the majority of the proposed questions. Our surveys go further than these, in understanding the context and detail in areas such as complaints, gas safety neighbourhood safety and so on.

Our figures are currently submitted to Housemark for benchmarking. Based on our experience, we would favour a single provider to be used so that results can be contextualised according to the differences in providers. This could result in more meaningful benchmark comparisons. Our concern is that looking at results in isolation, results in London and other urban cities generally report lower satisfaction or performance and these should be considered.