

## Appendix B

### RBC and RCRA Joint Response to Consultation on the proposed Tenant Satisfaction Measures

#### Question 1A

Do you agree that the proposed Tenant Satisfaction Measures Standard sets clear expectations for registered providers?

##### Answer

- Agree.

#### Question 1B

- Do you agree that the proposed Tenant Satisfaction Measures Standard supports the regulator in ensuring that the tenant satisfaction measures provide tenants with greater transparency about their landlord's performance (one of the aims of the tenant satisfaction measures in the white paper)?

##### Answer

- Agree.

#### Question 2

We are proposing to introduce two tenant satisfaction measures 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?

##### Answer

- Disagree Landlords' timescales vary, making comparison less meaningful. TP03 is more relevant.

#### Question 3

There are four proposed tenant satisfaction measures 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?

##### Answer

- Yes subject to comments in Q2

#### Question 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 tenant satisfaction measures: BS01 Gas safety checks, BS02 Fire safety checks, BS03 Asbestos safety checks, BS04 Water safety checks and BS05 Lift safety checks?

##### Answer

- Agree

#### Question 5

There are six proposed tenant satisfaction measures 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?

**Answer**

- Yes.

## Question 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?

**Answer**

Disagree This should be a transactional survey, as the number of tenants who complain is such a tiny percentage of all tenants

## Question 7

There are four proposed tenant satisfaction measures 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?

**Answer**

- Yes. Subject to comments in Q 6

## Question 8

There are three proposed tenant satisfaction measures 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?

**Answer**

- Yes.

## Question 9

For the tenant satisfaction measure 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?

**Answer**

- This is likely to be the most difficult to interpret of the proposed measures and the issue landlords can least influence and be fairly compared on. A more appropriate measure would be satisfaction that the landlord keeps outside areas safe and clean

## Question 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?

**Answer**

- Agree, although a transactional survey is advocated for complaints, a far higher proportion of tenants are likely to have an informed view of their landlord's approach to ASB

**Question 11**

There are four proposed tenant satisfaction measures 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?

**Answer**

No, see comments at Q9 re. removing TP09

**Question 12A**

Please tell us your views on the number of tenant satisfaction measures by selecting one of the following options:

**Answer**

There are too many tenant satisfaction measures in the suite, especially for landlords with a small stock and it is understood there are still more to be added

**Question 12B**

Do you think there are any tenant satisfaction measures that should be added to or removed from the final suite of tenant satisfaction measures?

**Answer**

Yes With rents rising for most tenants, a question on perceived value for money or perhaps linked to specific performance such as void re-let times

**Question 12C**

Overall, do you think the suite of tenant satisfaction measures works well as a whole in providing rounded information to tenants about their landlord's performance?

**Answer**

Partially – In reality the majority of tenants will not find the results relevant as they cannot switch to another provider

**Question 13**

Chapter 9 of the consultation document covers some general requirements that apply to all tenant satisfaction measures, which are addressed in more detail in Annex 2 Tenant Satisfaction Measures: Technical Requirements. These include how providers should collect and report the tenant satisfaction measures, 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?

**Answer**

Agree, the proposals are very clear

**Question 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?

**Answer**

Agree There is no 'one size fits all' method and many landlords are already undertaking surveys and know what works well for them. However best practice should be shared by the Regulator and regularly updated so resources are used as effectively as possible

**Question 15**

Chapter 10 of the consultation document covers some requirements that apply to the tenant satisfaction measures 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?

**Answer**

Agree but also see comments at Q 14

**Question 16**

We propose to tailor our tenant satisfaction measure requirements for registered providers that own fewer than 1,000 relevant homes. This includes not requiring them to submit tenant satisfaction measure data to the regulator, allowing them to collect and report tenant satisfaction measures 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?

**Answer**

Disagree This may still prove too onerous/expensive for very small landlords

**Question 17**

Chapter 13 of the consultation document covers our proposed guidance about the submission of information to the regulator in relation to the tenant satisfaction measures, which is set out in more detail in Annex 4. This includes generally not using tenant satisfaction measure 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?

**Answer**

Agree, only limited weight should be given to perception surveys

**Question 18**

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

**Answer**

- No RPs should only be required to collect tenant perception survey data at least once every two years as this would be less expensive but no less meaningful in terms of results

**Question 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).

**Answer**

No, Not all landlords have adequate data on tenants profiles making weighting and achieving representation difficult/impossible.

**Question 20**

Finally, if you have anything else that you would like to tell us about the proposals relating to the tenant satisfaction measures, including the detailed requirements set out in Annexes 2 and 3, please tell us.

**Answer**

This seems a good opportunity to also ask tenants their perception of how their landlord is promoting equality and tackling the stigma experienced by some.