

APPENDIX A

Draft Response to Tenant Satisfaction Measures (TSM) Consultation Questions

The Regulator of Social Housing (RSH) Draft TSM Standard		
<u>TSM Standard</u>		
<p>1. Required outcome 1.1. Registered providers must collect and provide information to support effective scrutiny by tenants of their landlord's performance in managing their homes and neighbourhoods.</p> <p>2. Specific expectations 2.1. Registered providers must meet the regulator's requirements in relation to the tenant satisfaction measures set by the regulator as set out in Tenant Satisfaction Measures: Technical Requirements and Tenant Satisfaction Measures: Tenant Survey Requirements.</p> <p>2.2. Registered providers must:</p> <p>a. collect information specified by the regulator relating to their performance against the tenant satisfaction measures. The information must be collected within a timeframe set by the regulator and must meet the regulator's requirements in Tenant Satisfaction Measures: Technical Requirements and Tenant Satisfaction Measures: Tenant Survey Requirements.</p> <p>b. annually publish their performance against the tenant satisfaction measures. This should include information about how they have met the regulator's requirements set out in Tenant Satisfaction Measures: Technical Requirements and Tenant Satisfaction Measures: Tenant Survey Requirements. This information must be published in a manner that is timely, clear, and easily accessed by tenants.</p> <p>c. annually submit to the regulator information specified by the regulator relating to their performance against those measures. The information must be submitted within a timeframe and in a form determined by the regulator.</p> <p>2.3. In meeting paragraphs 2.1 and 2.2 above, registered providers must ensure that the information is an accurate, reliable, valid, and transparent reflection of their performance against the tenant satisfaction measures.</p>		
No.	Consultation Question	Response
1	Do you agree that the proposed TSM Standard <ul style="list-style-type: none"> a. sets clear expectations for registered providers? • Agree. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>a. Agree</p> <p>b. Agree</p> <p>Additional commentary – We consider that the TSM Standard provides clear and concise expectations on registered providers regarding their obligations to submit and publish performance information in order to meet the White Paper underlying principle of</p>

<p>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)?</p> <ul style="list-style-type: none"> • Agree. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>providing transparency to tenants. This is supported by detailed technical and survey requirements on how to meet these obligations.</p>
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Keeping Properties in Good Repair

Keeping Properties in Good Repair TSMs

RP01 Homes that do not meet the Decent Homes Standard - This TSM would report on the proportion of homes that do not meet the Decent Homes Standard.

The Government is leading a review of the Decent Homes Standard to consider if it should be updated, including consideration of what the Standard might say about communal areas and green spaces. The RSH consider that the introduction of a TSM on communal areas meeting a required standard would be more practicable once the detail about any revised standard has been developed as part of the Government's review. The RSH will therefore decide on the most appropriate action to take in relation to introducing a TSM on communal areas meeting a required standard once this review is concluded.

RP02 Repairs completed within target timescales - Proportion of (non-emergency) responsive repairs completed within the provider's target timescale during the reporting year. For context, providers must also report their target timescales for completing (non-emergency) responsive repairs used to generate this TSM.

As part of the proposed TSM, each provider would be required to publish their target timescales for completing non-emergency responsive repairs. For some providers this may include more than one target timescale, for example for urgent and other non-emergency repairs. While many providers already record repairs performance against target timescales, it is recognised that providers currently take a range of approaches to reporting repairs performance and a minority may not have established target timescales. In these cases, the RSH does not think it is disproportionate to require a target to be established for the purposes of transparently communicating repairs performance.

TP02 Satisfaction with repairs - Proportion of respondents who have received a repair in the last 12 months who report that they are very satisfied or fairly satisfied with the repairs service.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: First question: *'Has your landlord carried out a repair to your home in the last 12 months?'* Yes/No. If yes, Second question: *'How satisfied or dissatisfied are you with the repairs service you have received to your home from your landlord over the last 12 months?'*

The RSH propose that providers must collect data on tenant satisfaction with their repairs service through a perception survey, rather than transactional surveys triggered following the completion of a repair, in order to generate data for this TSM. Evidence strongly suggests that the use of transactional rather than perception surveys has a significant impact on satisfaction scores and permitting a mix of approaches is likely to significantly limit comparability across

providers. The vast majority of tenant households are likely to have had at least one responsive repair in the last 12 months and hence would be in a position to respond to this perception survey question.

TP03 Satisfaction with time taken to complete most recent repair - Proportion of respondents who have received a repair in the last 12 months who report that they are very satisfied or fairly satisfied with the time taken to complete their most recent repair.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: First question: *'Has your landlord carried out a repair to your home in the last 12 months?'* Yes/No. If yes, Second question: *'How satisfied or dissatisfied are you with the time taken to complete your most recent repair after you reported it?'*

Given that responsive repairs are the main interaction between many tenants and providers, the RSH thinks there is merit in ensuring that tenant perception measures offer a sufficiently rounded view of performance in this service area. Timeliness of repairs is a key issue that matters to tenants, and this measure will enable management information on the timeliness of responsive repairs (RP02) to be cross-referenced against tenant perceptions on the same issue.

The RSH has carefully considered a range of alternative question wording (e.g., satisfaction with the repair being completed 'right first time', quality of the repair or the ease of arranging the repair). Compared to these alternatives, the RSH thinks that the proposed measure is clear, well-understood, and reflects a broad but distinct set of issues on responsive repairs that matter to tenants. Overall, this TSM would offer a more rounded view of repairs than overall satisfaction with a repairs service alone (TP02).

No.	Consultation Question	Response
2	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>Agree – We consider that measuring timeliness of repairs is an important gauge for us and our tenants in terms of understanding performance. We do currently have target timescales for repairs and use transactional satisfaction surveys following a repair, as these provide us with an ongoing and effective operational and contract management tool. We would also capture this type of information to inform HouseMark and STAR Surveys. We therefore do not envisage that incorporating these repairs questions into the TSM Standard would create significant additional burden.</p>
3	<p>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?</p> <ul style="list-style-type: none"> • Yes. • No – please explain and provide any alternative suggestions where relevant. 	<p>Yes</p> <p>Additional commentary – As explained in question 2, we currently capture information regarding repairs, including information on homes that do not meet the Decent Homes Standard. We consider this performance information to be central to the services we provide and so give a rounded view of performance under this theme.</p>

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

Maintaining Building Safety TSMs

BS01 Gas safety checks - Proportion of homes for which all required gas safety checks have been carried out.

BS02 Fire safety checks - Proportion of homes for which all required fire risk assessments have been carried out.

BS03 Asbestos safety checks - Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out.

BS04 Water safety checks - Proportion of homes for which all required legionella risk assessments have been carried out.

BS05 Lift safety checks - Proportion of homes for which all required communal passenger lift safety checks have been carried out.

The RSH propose that these TSMs will measure the number of individual homes for which all relevant safety checks have been completed, as a proportion of all homes which required the specified safety checks (in each case in relation to the home itself and/or in relation to any communal or other relevant parts which required the specified safety check). For example, if a required fire risk assessment (FRA) on a block of 100 flats is outstanding, then the TSM would reflect that these 100 homes did not have all required FRAs in place.

The RSH are not proposing to introduce a TSM relating to electrical safety as part of this consultation. The Department for Levelling Up, Housing and Communities plans to consult on electrical safety in the social rented sector and a decision will be made later on the most appropriate action to take in relation to introducing a TSM on electrical safety.

TP04 Satisfaction that the home is well maintained and safe to live in - Proportion of respondents who report that they are very satisfied or fairly satisfied that their home is well maintained and safe to live in.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘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?’*

The RSH has drafted the question so it does not use terms such as ‘health and safety’ which may not be clearly or consistently understood.

No.	Consultation Question	Response
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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? <ul style="list-style-type: none"> Agree – please explain. 	Agree – We agree that this approach would provide a baseline level of assurance from information that registered providers should be collecting as a matter of course, and should not create significant additional burden. Therefore, we feel this is proportionate whilst at the same time reflects the aims of the White Paper.
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	<ul style="list-style-type: none"> Disagree – please explain and provide any alternative suggestions where relevant. 	
5	<p>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?</p> <ul style="list-style-type: none"> Yes. No – please explain and provide any alternative suggestions where relevant. <p>Please tell us if you have any comments on any of the individual TSMs under the theme of Maintaining Building Safety.</p>	<p>Yes – While we agree that these measures will give a well-rounded picture of performance regarding whether safety checks have been completed in each area, we do not feel that these measures will demonstrate safety fully. If all that is required is to measure properties that need a risk assessment and those properties where we have a risk assessment, this is straightforward, yet it does not completely demonstrate safety, for example whether remedial action identified has been addressed. We do however appreciate that by incorporating remedial action in the measures would be complex and raise issues with comparability between providers.</p>

Effective Handling of Complaints

Effective Handling of Complaints TSMs

CH01 Complaints relative to the size of the landlord - Number of:

1. Stage one complaints received per 1,000 homes during the reporting year

and

2. Stage two complaints received per 1,000 homes during the reporting year.

Providers must adhere to the definitions of ‘complaint’, ‘stage one’ and ‘stage two’ as set out in the Housing Ombudsman’s Complaint Handling Code.

CH02 Complaints responded to within Complaints Handling Code timescales - Proportion of:

1. Stage one complaints responded to within the Housing Ombudsman’s Complaint Handling Code timescales

and

2. Stage two complaints responded to within the Housing Ombudsman’s Complaint Handling Code timescales.

TP11 Satisfaction with the landlord’s approach to handling of complaints - Proportion of respondents who report that they are very satisfied or fairly satisfied with their landlord’s handling of complaints.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘How satisfied or dissatisfied are you with your landlord’s approach to complaints handling?’*

TP12 Tenant knowledge of how to make a complaint - Proportion of respondents who report that they strongly agree or agree with the statement *“I know how to make a complaint to my landlord if I am not happy with the service I receive”*.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘To what extent do you agree or disagree with the following’: “I know how to make a complaint to my landlord if I am not happy with the service I receive?”*

No.	Consultation Question	Response
6	<p>Do you agree with the proposal that TP11 Satisfaction with the landlord’s approach to handling of complaints is measured by a perception survey?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>Agree – We value the importance of measuring satisfaction with complaint handling to inform learning and improvement, and currently provide the opportunity for our residents to complete transactional surveys upon closure of a complaint. This approach allows us to continuously identify themes and trends on an ongoing basis that could highlight systematic issues, risks or areas for improvement. We understand the weakness of using transactional perception surveys for providing the basis for a comparable measure across providers due to the small minority of tenants making a formal complaint each year, and only a proportion of those complainants reply to a transactional survey. Therefore, we appreciate a transactional measure may not meet minimum standards of statistical accuracy to enable comparability and so we understand the preferred use of perception surveys for this reason.</p>
7	<p>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?</p> <ul style="list-style-type: none"> • Yes. • No – please explain and provide any alternative suggestions where relevant. <p>Please tell us if you have any comments on any of the individual TSMs under the theme of Effective Handling of Complaints.</p>	<p>Yes</p> <p>Additional commentary – As the measures on complaint handling aligns with the Housing Ombudsman’s Complaint Handling Code requirements, these measures seem sensible and should not create an additional burden.</p>

Respectful and Helpful Engagement

Respectful and Helpful Engagement TSMs

TP05 Satisfaction that the landlord listens to tenants views and acts upon them - Proportion of respondents who report that they are very satisfied or fairly satisfied that their landlord listens to tenant views and acts upon them.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘How satisfied or dissatisfied are you with the extent to which your landlord listens to your views and acts upon them?’*

TP06 Satisfaction that the landlord keeps tenants informed about the things that matter to them - Proportion of respondents who report that they are very satisfied or fairly satisfied that their landlord keeps tenants informed about things that matter to them as a tenant.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘How satisfied or dissatisfied are you with the way your landlord keeps you informed about things that matter to you as a tenant?’*

TP07 Agreement that the landlord treats tenants fairly and with respect - Proportion of respondents who report that they strongly agree or agree that their landlord treats them fairly and with respect.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: *‘To what extent do you agree or disagree with the following “my landlord treats me fairly and with respect”?’*

No.	Consultation Question	Response
8	<p>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?</p> <ul style="list-style-type: none"> • Yes. • No – please explain and provide any alternative suggestions where relevant. <p>Please tell us if you have any comments on any of the individual TSMs under the theme of Respectful and Helpful Engagement.</p>	<p>Yes</p> <p>Additional commentary – We agree this will give a well-rounded picture of performance under this theme. TP05 and TP06 ensure a clear distinction between measuring perceptions on how tenants feel that providers listen and act on feedback from them as well as the quality of communication from the provider to its tenants. Providers should be attuned to how they engage and communicate with their tenants, and TP05 and TP06 will inform satisfaction rates on this. In addition, providers should ensure that treating tenants fairly and with respect is engrained within the culture of the organisation, and TP07 is an important measure for this.</p>

Responsible Neighbourhood Management

Responsible Neighbourhood Management TSMs

NM01 Anti-social behaviour (ASB) cases relative to the size of the landlord - Number of ASB cases opened per 1,000 homes by or on behalf of the registered provider during the reporting year.

TP08 Satisfaction that the landlord keeps communal areas clean, safe and well maintained - Proportion of respondents who report that they are very satisfied or fairly satisfied that their landlord keeps communal areas clean, safe and well maintained.

The question used to generate this TSM would need to be asked as a perception survey using the following wording: First question: ‘*Do you live in a building with communal areas, either inside or outside, that you share with other people who live in the building?*’ Yes/No. If yes, Second question: ‘*How satisfied or dissatisfied are you that your landlord keeps these communal areas clean, safe and well maintained?*’

TP09 Satisfaction that the landlord makes a positive contribution to neighbourhoods - Proportion of respondents who report that they are very satisfied or fairly satisfied with the extent to which their landlord makes a positive contribution to the neighbourhood.

The question used to generate this TSM would need to be asked as a perception survey and our lead option for the wording is: ‘*Thinking about what your landlord does to improve your neighbourhood as a place to live... How satisfied or dissatisfied are you with the extent to which your landlord makes a positive contribution to your neighbourhood?*’

The RSH is also seeking views on the following alternative perception survey wording on responsible neighbourhood management: ‘*How satisfied or dissatisfied are you with your neighbourhood as a place to live?*’

TP10 Satisfaction with the landlord’s approach to handling of anti-social behaviour - Proportion of respondents who report that they are very satisfied or fairly satisfied with their landlord’s handling of anti-social behaviour.

The question used to generate this TSM must be asked as a perception survey using the following wording: ‘*How satisfied or dissatisfied are you with your landlord’s approach to handling anti-social behaviour?*’

No.	Consultation Question	Response
9	<p>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?</p> <ul style="list-style-type: none"> • Yes – I agree with the lead proposal for TP09 which is Satisfaction that the landlord makes a positive contribution to neighbourhoods. 	<p>Yes – We agree with the lead proposal for TP09 which is Satisfaction that the landlord makes a positive contribution to neighbourhoods.</p>

	<ul style="list-style-type: none"> • No – I prefer the alternative option for TP09 which is Satisfaction with your neighbourhood as a place to live – please explain. • 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. 	
10	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>Agree – We agree with this proposal for the reasons stated that will capture a wider range of tenant's views over and above those that have actually reported anti-social behaviour.</p>
11	<p>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?</p> <ul style="list-style-type: none"> • Yes. • No – please explain and provide any alternative suggestions where relevant. <p>Please tell us if you have any comments on any of the individual TSMs under the theme of Responsible Neighbourhood Management.</p>	<p>Agree – We agree with the proposed TSM's apart from TP10 - Satisfaction with the landlord's approach to handling of anti-social behaviour (ASB). Although asking this way will increase the number of tenants including feedback from tenants who have not experienced ASB, this could be affected by other factors such as policing, environment or other services. Focusing on tenants with experience of ASB where an ASB case has been opened will provide more accurate information on the services the landlord has actually provided.</p> <p>We also question the inclusion of domestic abuse and hate crime within a TSM on ASB and whether there should be separate TSMs on domestic abuse and hate crime. Domestic abuse and hate crime have their own distinct definitions and are arguably not within the definition of ASB. In addition, particularly in the case of domestic abuse, there are separate powers and legislation to assist victims and deal with perpetrators under the Domestic Abuse Act 2021.</p> <p>At the moment domestic abuse and hate crime is included within the remit of our ASB Policy. However, we will be developing a separate Domestic Abuse Policy due to the distinct difference it is to ASB and in light of the Government's aim in White Paper to expect the RSH to review and amend its regulatory standards to make it clear that landlords should have a policy setting out how they should tackle issues surrounding domestic abuse, working with other agencies as appropriate.</p>

The TSM suite

The RSH proposes that there will be 22 TSMs of which there will be 12 tenant perception measures and 10 that will be collected through providers' management information.

The perception measures will be collected via tenant perception surveys and not transactional surveys (i.e. carried out periodically and not triggered by a recent interaction e.g. after a repair).

The range of proposed TSMs reflects the themes set out in the White Paper and the expectation that tenants are given opportunity to voice their perspectives on issues that matter to them. For many of these issues, tenant perception surveys are likely to be the only viable method to generate robust data. The RSH are conscious, however, that a more extensive set of survey questions can risk survey fatigue among respondents, reduce response rates, and make some survey formats more difficult to deliver - this would be a risk for providers to manage as they seek to incorporate the proposed questions into wider surveys. Overall, the RSH judge that the scope of the proposed tenant perception measures is proportionate to the aims of the White Paper. However, this is a particular issue on which the RSH would welcome views from tenants, providers and other stakeholders.

No.	Consultation Question	Response
12	<p>Number of TSMs</p> <p>a. Please tell us your views on the number of TSMs by selecting one of the following options:</p> <ul style="list-style-type: none"> • There are too many TSMs in the suite – please explain. • There is the right number of TSMs in the suite. • There are too few TSMs in the suite – please explain. <p>b. Do you think there are any TSMs that should be added to or removed from the final suite of TSMs?</p> <ul style="list-style-type: none"> • Yes – please tell us what they are and why. • No. <p>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?</p> <ul style="list-style-type: none"> • Yes – please explain. • Partially – please explain and provide any alternative suggestions where relevant. • No – please explain and provide any alternative suggestions where relevant. • Don't know. 	<p>a. There is the right number of TSMs in the suite.</p> <p>b. Yes – As our comment in question 11, we feel that domestic abuse and hate crime should be classed as a separate issues from ASB and warrant being TSMs in their own right.</p> <p>c. Yes – We consider the suite of TSMs works well as a whole in providing rounded information to tenants about the priorities contained in the White Paper. The TSMs will of course not prevent providers from measuring other areas of satisfaction and performance outside of the regulatory regime that they feel are important and pertinent to their individual organisation and tenants.</p>

General TSM Requirements

Relevant homes - Data for the proposed TSMs would have to be collected for the following property types (where relevant):

- Low cost rental accommodation (LCRA). This includes for example general needs, supported housing, intermediate rent and temporary social housing
- Low cost home ownership (LCHO). This includes, for example, shared ownership homes (which have not been fully staircased)

For the purposes of the TSMs, each of the following is a single dwelling unit:

- self-contained residential homes; plus
- bed spaces in a non-self-contained property.

The following property types must not be included in providers' TSM data collection:

- Non-social homes e.g., market rent homes
- Legacy social housing which is social housing only by virtue of legacy provisions in the Act [footnote 18].
- Leasehold homes including 100% owned LCHO homes where the resident has fully staircased [footnote 19].

Reporting dates and periods - Providers with 1,000 or more relevant homes would be required to collect information and report TSMs annually according to a reporting year that runs from 1 April to 31 March. Where the RSH require information to be calculated as at 'year end', they propose that such providers would report information as at 31 March.

Data protection - Providers must be compliant with the relevant privacy and data protection legislation when processing personal data. Providers must protect respondent's confidentiality in order that respondents feel confident to give honest feedback in tenant perception surveys. This includes ensuring that identifiable individual responses are not shared internally or externally beyond those who require the information to produce the TSMs, unless the respondents give explicit consent, and this is managed appropriately. This applies to both the conduct of the survey itself, and the publication of results.

Data accuracy - It would ultimately be the responsibility of Boards of private registered providers and governing bodies of local authority registered providers to ensure that reported TSMs had been calculated accurately and in accordance with regulatory requirements.

No.	Consultation Question	Response
13	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>Agree – We agree with the proposals on the type of relevant homes the TSMs would apply to.</p> <p>We consider an annual data return to be appropriate and proportionate. This is standard practise and consistent with many other statistical data returns.</p> <p>In terms of data protection, we take this extremely seriously and strongly agree that providers must be compliant when processing data.</p> <p>We agree that Boards and governing bodies should take ownership of the responsibility of ensuring the accuracy of TSM data and expect that the results of TSMs, including</p>

analysis of data accuracy, would as a matter of course need to be reported to the provider's accountable body for scrutiny before submission.

Tenant Perception Survey Requirements

Survey collection method - Providers would be allowed to use any collection method including face-to-face, telephone, postal, or email/online, and they would be allowed to use more than one collection method.

Survey type - The RSH propose that providers must generate data for the tenant perception measures TP01 – TP12 using data from tenant perception surveys only i.e., surveys which periodically capture tenants' general views of landlord performance and which are not triggered by a recent interaction with the landlord. A perception survey would allow tenants to directly express their views of their provider's performance on a range of issues. Transactional surveys are not the preferred type of survey due to the complexities associated with them and the risk the data being less comparable between different organisations.

Survey questions and response options - The RSH propose that providers would be required to use the prescribed question wording and response options for each survey question as specified in Tenant Satisfaction Measures: Tenant Survey Requirements (Annex 3). The RSH consider that consistency in question wording and response scale is necessary to be able to compare results between providers.

Questionnaire structure - Providers would have to inform respondents that the survey will be used to calculate annual TSMs to be published, and approximately how long the survey would take them to complete at the start of the survey.

In addition to the prescribed questions, providers would be able to include other questions in the same tenant perception survey questionnaire.

The RSH propose to require that the overall satisfaction question to generate the overall satisfaction TSM must be the first question in a perception survey questionnaire used to generate TSMs. Questions to generate the other TSMs would be required to come before any other question(s) that a provider chooses to include on the same topic.

Relevant tenant population for the tenant perception measures - It is proposed that a provider that owns 1,000 or more LCRA homes would have to report tenant perception measures for LCRA separately. Similarly, providers that own 1,000 or more units of LCHO would have to report tenant perception measures for LCHO separately.

Providers with fewer than 1,000 homes of LCRA and fewer than 1,000 homes of LCHO would be able to either calculate and report perception measures for LCRA (only), LCHO (only), both property types separately, or both property types combined. Providers that own 1,000 or more LCRA homes but fewer than 1,000 LCHO homes, would only be required to report tenant perception measures for LCRA (and vice versa).

Survey timings - The actual perception survey could take place at a single point in time, be spread out across a period of time, or be carried out on a rolling basis (e.g., quarterly or monthly). It would however have to be a single exercise, so for example the same tenant could not provide two responses in the same survey period.

Providers that own a total of 1,000 or more relevant homes (LCRA and LCHO) would be required to carry out a tenant perception survey at least annually to generate data for the tenant perception measures.

Providers that own fewer than 1,000 relevant homes, would be required to carry out a perception survey at least once every two years. Registered providers that own fewer than 1,000 relevant homes would be allowed to collect and report annual TSMs according to a reporting year other than 1 April to 31 March.

Sampling and representativeness - The RSH propose that providers would be required, as far as possible, to generate a sample size for overall satisfaction (TP01) that meets their proposed minimum level of statistical accuracy. This is to allow meaningful comparisons between providers and is standard practice when producing a robust sample to estimate tenant satisfaction scores. The sample size refers to the total number of responses to the tenant perception survey.

Providers must ensure that as far as reasonably possible the calculated satisfaction scores are representative of their tenant population. Providers would be expected to undertake reasonable checks for differences between the achieved sample and their tenant population in terms of characteristics associated with different average satisfaction scores and weighting (where appropriate and reasonable) in order to balance any under-representation or over-representation in the sample.

Where it is practically difficult to achieve minimum sample sizes using conventional survey collection methods, providers may undertake a census as a means of meeting the requirements in relation to sample size.

Providers must ensure that, as far as possible, survey responses used to calculate perception TSMs are representative of the relevant tenant population.

Providers would be expected to take reasonable steps to assess and remove barriers that may exist for specific groups of tenants participating in surveys, which should have a positive impact on equality considerations, including advancing equality of opportunity between people who share a protected characteristic and those who do not.

In-house or outsourced - Providers would be able to choose to conduct tenant perception surveys and calculate the perception measures either in-house or through an external contractor.

Publication of survey approach - Providers would be required to publish a summary of their tenant survey methodology used to generate tenant perception survey data for the TSMs, alongside their published TSM data. This would include a summary of achieved sample size (number of responses), timing of survey, collection method, sample method, assessment of representativeness of the sample against the relevant tenant population, any weighting applied to generate the reported perception measures, and any other methodological issues likely to have a material impact on the tenant perception measures reported.

No.	Consultation Question	Response
14	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>Agree – Being able to choose the most appropriate survey collection method will provide flexibility for registered providers. It also allows scope to tailor survey methods to meet the needs of the tenant profile and assist in achieving representativeness e.g., younger tenants may be more likely to use online surveys, older people may be more likely to take part in postal or phone surveys. We will be consulting with our residents on how they would most prefer to be communicated with in respect of future tenant engagement work, including engagement in perception surveys.</p>
15	<p>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</p>	<p>Agree – While undertaking perception surveys for the purpose of the TSMs in addition to existing transactional surveys we carry out would cause some additional burden and costs to us, we agree that perception surveys should be the preferred survey type for the</p>

	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain and provide any alternative suggestions where relevant. 	<p>TSMs. We accept that transactional surveys would experience complexities associated with their use and risks the data being less comparable between different providers.</p> <p>We also feel that it is reasonable to use prescribed questions and response options, as they clearly enable comparison between different providers, which we would find a useful benchmarking tool. Further, being able to choose the survey frequency will provide flexibility for registered providers depending on e.g. their circumstances, size and resources. And, we also support the proposed requirements on sampling and representativeness to ensure that the required confidence levels are achieved. In our view, this particular requirement should be fundamental to any survey work.</p>
Registered Providers that own fewer than 1,000 homes		
<p>The RSH recognise the practical barriers for small providers in conducting surveys to the same statistical accuracy and detail as larger providers, and the likelihood that many small providers will need to employ a census survey approach to meet the requirements. Smaller providers would be able to:</p> <ul style="list-style-type: none"> • Carry out the survey at least once every 2 years • Collect and report annual TSMs according to a reporting year other than 1 April to 31 March • Choose to report tenant perception measures for households in LCRA, LCHO stock, or both stock types combined • Generate an estimate for overall satisfaction accurate to a margin of no more than +/-5% at a 95% confidence level or choose to undertake a census method that will be considered to have met the requirement for statistical accuracy, irrespective of the number of responses they achieve • Only required to undertake a high-level assessment of representativeness of the achieved sample against the relevant tenant population, for example against a small number of key characteristics, and are not required to weight responses unless there is strong evidence of a significant bias in estimated scores • Omit some tenant perception measures from published information if providers judge this to be a material risk to tenant confidentiality 		
No.	Consultation Question	Response
16	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain. 	<p>Agree – As we are a registered provider of over 1,000 properties, the proposal to tailor TSM requirements for providers that own fewer than 1,000 homes will not impact us. However, we understand the reasoning behind these particular proposals and have no objections to them.</p>

Draft guidance about the submission of TSM information

Guidance about the submission of TSM information to the RSH will be published. The RSH consider it particularly important for the guidance to make clear that:

- providers with fewer than 1,000 relevant homes would not be required to annually submit their TSM information to the RSH
- in good time before providers are required to make their annual submission of TSM information to the RSH, they will specify the TSM information they are required to submit, the form in which that information must be submitted, and by when
- on an annual basis, the RSH will collate TSM information submitted to them by providers that own 1,000 or more relevant homes and publish the results
- the RSH would not generally use TSM information as a source of regulatory intelligence in isolation, but rather use it as a source of information they may have regard to alongside other sources
- TSM information could be used to help the RSH to identify particular areas where they might wish to seek further assurance from a provider about meeting their standards
- the submission of late, incomplete or inaccurate TSM information may be indicative of a weak control environment. Given this, failure to provide accurate and timely TSM information could, where appropriate, be reflected in the RSH's judgement of a provider's compliance with the regulatory standards.

No.	Consultation Question	Response
17	<p>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?</p> <ul style="list-style-type: none"> • Agree – please explain. • Disagree – please explain. 	<p>Agree – We agree with the proposed approach to issue guidance about the submission of information to the RSH in relation to the TSMs.</p> <p>We acknowledge that, in the draft guidance, the TSMs can only provide one element of demonstrating how a registered provider is performing and this information will not be used in isolation. We would however appreciate clarification from the RSH about what other sources of information they may be likely to have regards to alongside the TSM information.</p> <p>We would also appreciate the RSH being more specific in the guidance with regards to defining what 'in good time' means in relation to when the RSH will specify the requirements for the TSM submission.</p>

Draft Regulatory Impact Assessment

The draft Regulatory Impact Assessment aims to understand the costs and benefits to providers, tenants and the RSH regarding the introduction of the TSMs.

Problem under consideration and rationale for regulatory intervention - The White Paper acknowledges that providers are already required by the RSH to give tenants timely and relevant performance information, including the publication of an annual report, but that the format and content of the information can vary significantly. This means that tenants (and the RSH) are not able to easily compare the performance information of their provider with that of other providers and this limits tenants' ability to hold their landlord to account for their performance. In addition, provider performance information is not currently published in one place, which means the performance data of providers is not as accessible to tenants as it could be.

Policy option 0 – Do nothing - Doing nothing would mean that the above problems would persist. For this reason, this policy option is not proposed. The costs and benefits of the other policy options are expressed relative to this do nothing option.

Policy option 1 - Amend the regulatory framework to introduce prescribed TSMs for registered providers as specified in the proposed requirements

- This is the lead option and is consistent with the detailed proposals set out in the RSH's consultation document.

The expected transitional costs on providers to implement the TSMs (e.g. additional staff training costs as well as costs associated with reviewing and adjusting organisational systems, policies and processes) are considered to be low relative to provider turnover, but the impact on small providers is likely to be proportionately greater.

The cost for local authority providers are likely to be proportionately higher than for private registered providers due to, for example that local authority providers do not currently carry out tenant perception surveys as frequently as large private registered providers.

Providers may incur ongoing additional costs beyond transitional costs and additional tenant perception survey activities (e.g. additional costs of generating, publishing and submitting to the RSH a wider range of data that previously, or generating the data in a different way). These costs are difficult to disentangle from existing business as usual activities, and therefore the RSH proposes that these costs will not be formally estimated for the purposes of the Assessment. In addition, TSMs are intended to be used as part of our enhanced consumer regulation, which requires legislation before implementation. Where appropriate, the RSH intend to consider the impact of any future regulatory requirements at a later date.

Providers would derive benefits from the introduction of the TSMs, as would tenants and the RSH. However, many of the benefits of the TSMs are inextricably linked to the wider White Paper proposals including to strengthen the regulator's consumer regulatory role, which requires legislative change for the RSH to implement. Due to the difficulty in trying to estimate the social value generated by the TSMs (e.g., lack of robust data and evidence, difficulty in identifying causality of single measures from the White Paper proposals) the Assessment has focussed solely on monetising the costs.

Amending the regulatory framework to introduce prescribed TSMs for providers under the lead option should lead to benefits for providers and tenants. Clear, comparable and accessible TSMs that are collected and reported in a timely manner should lead to increased transparency about provider performance for tenants and other stakeholders and would mean tenants would be able to more easily compare the performance of their provider with other providers. Providers would have new opportunities to scrutinise their own performance, including how it compares to other providers, which may help improve their performance.

The monetised costs are intended to further enable feedback (including challenge) in response to the consultation. The evidence base explains how the cost estimates have been arrived at.

The RSH assume that providers would bear the full resource implications of the regulatory changes and assume that the number of providers in the future remains at current levels.

Policy option 2 – Less extensive tenant perception survey requirements - Equivalent to the lead option but large providers would only be required to collect tenant perception survey data at least once every two years, and small providers at least once every three years. The cost impact on the sector overall under this policy option, appears to be extremely low.

Under this policy option, providers would benefit from a reduced regulatory burden and it will still provide clear, comparable and accessible TSMs. However, sector intelligence and our stakeholder engagement suggest many large providers are at least carrying out annual tenant perception surveys. The RSH's requirements might therefore inadvertently encourage providers who are already carrying out increased tenant perception survey activity to reduce that activity

to the minimum base level established by our requirements, which might therefore result in some decreased level of intelligence for providers about tenants' views of their service performance and a reduced tenant voice.

Policy option 3 – More extensive tenant perception survey requirements - Equivalent to the lead option but small providers would also need to collect tenant perception survey data at least annually. Providers could still choose their own collection method(s) for the tenant perception surveys, but online surveys would not be permitted. The cost impact on the sector overall under this policy option, appears to be low. However, small providers would be more disproportionately impacted compared to policy option 1.

Under this policy option, providers would benefit from a reduced regulatory burden and it will still provide clear, comparable and accessible TSMs. However, sector intelligence and our stakeholder engagement suggest many large providers are at least carrying out annual tenant perception surveys. The TSM's requirements might therefore inadvertently encourage providers who are already carrying out increased tenant perception survey activity to reduce that activity to the minimum base level established by our requirements, which might therefore result in some decreased level of intelligence for providers about tenants' views of their service performance and a reduced tenant voice.

A requirement to annually survey tenants would result in a significant and potentially disproportionate regulatory burden for small providers. It might also reduce transparency for tenants. Statistical accuracy issues might be intensified through the frequency of surveys. As small providers are more likely to take a census approach to surveying, tenants may be more likely to suffer from survey request fatigue. A reduction in survey return rates would result in higher margins of error for small providers and further reduce the statistical accuracy of the tenant perception measures.

Policy option 4 – National tenant survey - Equivalent to the lead option but the RSH would commission its own national tenant survey to collect the tenant perception data for large providers. Large providers would only be required to collect, submit to the RSH, and publish management information related TSMs. The approach to small providers would be the same as described in policy option 1 – small providers would be required to carry out tenant perception surveys (using survey method(s) of their choice)) at least once every two years and publish the results to their tenants at least annually.

It is assumed large providers will continue to carry out their existing tenant perception survey work and would not cease to do so if the RSH were to undertake its own survey to generate the TSMs. For example, under the current Tenant Involvement and Empowerment Standard, providers must provide timely and relevant performance information to support effective scrutiny by tenants of their landlord's performance in a form which registered providers seek to agree with their tenants. Therefore, this policy option would be likely to produce greater duplication of efforts than the other options. The RSH has estimated this policy option to be the costliest option overall and there are a number of disadvantages with this option e.g. added risks and complexities.

Whilst this policy option is estimated to be the costliest option and has some significant disadvantages, the national tenant survey would offer some benefits:

- A potential increase in trust in the tenant perception data due to the independent role of the RSH in commissioning the survey.
- Reduces the direct regulatory burden on large providers as the RSH would take responsibility for carrying out the tenant perception surveys for the TSMs (although many providers will continue to carry out their own perception surveys)

The tenant perception TSM data would be available as standard at registered provider level – some tenants might find this data more transparent if they identify with their landlord at a provider level and providers might find this data more useful for performance management purposes and improving service delivery, as they might more easily be able to identify where issues originate. However, under the other policy options providers may choose to collect/publish TSM data and/or other performance information in a way that meets their own needs and/or the needs of tenants. Also, as noted above, providers are required by existing

regulatory requirements to provide timely and relevant performance information to support effective tenant scrutiny by tenants of their landlord's performance in a form which providers seek to agree with their tenants.

No.	Consultation Question	Response
18	<p>Do you agree with our conclusions in the draft Regulatory Impact Assessment?</p> <ul style="list-style-type: none"> • Yes – please give details. You are invited to include evidence to support your view. • No – please give details. You are invited to include evidence to support your view. 	<p>Yes – We agree that policy option 0, to 'do nothing', would mean that the objectives of the White Paper will not be met. We recognise that the lead policy option 1 to collect and report on the TSMs annually will incur greater costs and burden to us than policy option 2, which considers collecting and reporting on the TSMs every 2 years. However, less extensive tenant perception survey requirements could weaken effective scrutiny and transparency of performance if data is collected and published less frequently. In terms of policy option 4, where the RSH undertakes a national tenant survey, we agree this could risk duplication where large providers may continue to carry out existing tenant perception survey work to support other areas of scrutiny on performance. Therefore, we agree with the conclusions in the draft Regulatory Impact Assessment to support policy option 1 for providers to collect and report on the TSMs annually.</p>

Draft Equality Impact Assessment

The draft Equality Impact Assessment aims to understand the potential impact on equality of the proposals to introduce the TSMs and addressing those impacts where relevant. TSM proposals that the RSH consider having the potential for either negative or positive equality impact include. As follows:

Proposal 1 (positive impact) – Providers must assess the extent to which their achieved sample is representative of the relevant tenant population and to undertake reasonable checks for differences between the total responses to the tenant perception survey and their tenant population in terms of characteristics associated with different average satisfaction scores. Providers would need to judge which characteristics they include in this assessment based on their tenant profile and available data - This proposal is likely to have a positive impact as it should help to ensure that large providers' TSM perception survey results are representative of their tenant profile.

Proposal 2 (positive impact) – If the provider's achieved survey sample is not representative of their tenant population, they must appropriately weight the responses to ensure that, as far as possible, the sample is representative - This proposal is likely to have a positive impact as it should help to ensure that large providers' TSM perception survey results are representative of their tenant profile.

Proposal 3 (positive impact) – Providers can choose their survey method(s) but must demonstrate their rationale for their chosen survey collection method(s) - This proposal is likely to have a positive equality impact because it would enable providers to tailor their survey methods to meet the needs of their tenant profile. It would also align with the RSH's principle of co-regulation and their duty to minimise interference.

Proposal 4 (positive impact) – Providers must take reasonable steps to assess, identify and remove barriers to certain groups of tenants participating in surveys. In particular, this is in respect to tenants who share one or more protected characteristics under the Equality Act 2010 and in respect of duties of that Act. Barriers may include, but are not limited to, language barriers, visual impairment, literacy or lack of access to digital media. Where necessary to overcome barriers to participation, surveys can be completed by a carer or another household member on behalf of a tenant - This proposal is likely to have a positive impact, particularly for those tenants who are older, are non-English speakers or who have a disability.

Proposal 5 (positive impact) – Providers would be able to use additional visual features such as emojis alongside response options in their surveys, if they are necessary to overcome specific barriers to a particular group of tenants - Allowing the use of emojis to help illustrate the text response scales where necessary would be likely to have a positive equality impact, as it should help respondents to better understand the response options and therefore encourage wider survey participation, particularly by some disabled and younger tenants.

Proposal 6 (negative impact) – Providers who own fewer than 1,000 relevant properties would be required to collect and publish their TSM data, but the RSH are proposing that they would not be required to submit TSM data to the RSH - This proposal has been assessed as a potential negative impact as tenants would not be able to compare their landlord's performance via the RSH's published data. However, the RSH do not believe that putting this information into the public domain would help to advance equality, as they think that the data from small providers is highly likely to be less comparable than data from large providers.

Proposal 7 (negative impact) – The RSH are not proposing to require small providers to weight their survey responses unless there is strong evidence of a significant bias in estimated scores - This proposal could have a negative impact as it would mean that the responses of small providers may not be representative. However, the RSH are proposing this because, due to the significant challenge for small providers in achieving statistical validity and in carrying out weighting of their data, they do not consider there is sufficient justification to require small providers to weight their data unless there is strong evidence of a significant bias in estimated scores.

Proposal 8 (positive impact) – NM01 number of anti-social behaviour cases relative to the size of the landlord. Cases of Domestic Abuse and Hate incidents should be included in the data for this TSM - This proposal is likely to have a positive impact, as it should enable providers to scrutinise and compare their figures for anti-social behaviour, hate crime and domestic abuse.

Proposal 9 (negative impact) – BS05 - Lift safety checks – the proportion of homes for which all required communal passenger lift safety checks have been carried out. Data for this TSM would not include checks to internal lifts to the property e.g., stair lifts, hoists, through floor lifts etc) - This proposal could have a negative equality impact as the data would not include checks carried out on lifting equipment within individual properties, which are likely to be installed in households where someone has a disability or is older. It would not however remove any of the current landlord responsibilities to check such lifting equipment and provide such information on request to the regulator and others.

Proposal 10 (positive impact) – TP07 is the proportion of respondents who report that they strongly agree or agree that their landlord treats them fairly and with respect - This proposal would be likely to have a positive equality impact, as tenants would be able to judge themselves as to whether they have been treated with fairness and respect.

Proposal 11 (negative impact) – The proposed suite of TSMs does not include measures which specifically relate to equality - This proposal could have a negative impact on people with disability, age, gender reassignment, race, religion, sex, sexual orientation and pregnancy/maternity protected characteristics. The reasons for the RSH's proposed position are: the themes of the TSMs in the Social Housing White Paper do not specifically relate to equality, and the draft TSMs follow the themes set out in the White Paper; the TSMs are intended to be one part of our revised and strengthened approach to consumer regulation and providers would need to comply with the RSH's consumer standards, which include expectations around equality and understanding the diverse needs of tenants; and, tenant profiles of providers would need to be viewed in the context of their own location, which for some providers can cover large areas which may vary in their demographic profile.

Proposal 12 (positive impact) – The RSH are proposing to introduce a TSM on satisfaction with repairs (TP02) - Social renters with a Black HRP (18%) were more likely to live in a non-decent home, compared with White or Asian social renters (11% and 7% respectively) according to data from the EHS. In addition, ethnic minority social renters (8%) were more likely to live in a home with a Category 1 hazard than White social renters (5%). This TSM should have a positive equality impact, as it would create a national benchmark for satisfaction with repairs. Many large providers would be likely to include race in their assessment of representativeness and so would be able to identify significant differences in satisfaction in relation to race and be able to explore whether there is information that would indicate the reasons behind any disparity.

No.	Consultation Question	Response
19	<p>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).</p> <ul style="list-style-type: none"> • Yes – please give details. You are invited to include evidence to support your view. Please do not provide any sensitive personal information in your response. • No – please give details. You are invited to include evidence to support your view. Please do not provide any sensitive personal information in your response. 	<p>No – We agree with the majority of conclusions contained within the draft Equality Impact Assessment aside from the conclusion under Proposal 8 – ‘NM01 number of anti-social behaviour cases relative to the size of the landlord’ where cases of domestic abuse and hate incidents should be included in the data for this TSM. The Equality Impact Assessment concludes that this proposal is likely to have a positive impact, as it should enable providers to scrutinise and compare their figures for anti-social behaviour, hate crime and domestic abuse.</p> <p>As explained in our response to question 11, we feel that this TSM should not include domestic abuse and hate crime in the figure. In the case of hate crime, this is particularly relevant to protected characteristic groups of race, religion, sexual orientation, disability and gender reassignment as behaviour motivated by hostility or prejudice based on the persons protected characteristic. For the purpose of understanding and scrutinising the figures on ASB, domestic abuse and hate crime are each distinct forms of unacceptable behaviour and so should be separate measures.</p>
TSM proposals overall		
No.	Consultation Question	Response
20	<p>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.</p>	<p>We welcome the proposals in this consultation as they will enable greater transparency by ensuring tenants have information to hold their landlords to account. Whilst this will create additional burdens for our Housing Service to deliver on the TSMs, we recognise the benefits of the longer term aims of increasing improvements in performance and tenant satisfaction across the social housing sector.</p>