



# **Catalyst Response to Tenant Satisfaction Measures Consultation**

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## Consultation on Tenant Satisfaction Measures by the Regulator of Social Housing

Catalyst is one of the UK's leading housing associations, owning and managing over 37,000 homes housing over 65,000 customers in London and the South East.

We are a member of the G15 group of large London housing associations and BuildEast group of large developing housing associations in the East of England. In April 2022 Catalyst will merge with Peabody to become the second largest housing association in England.

We are pleased to have the opportunity to provide a response to this consultation. We have recently reviewed our service standards and co-created standards with our customers which has given us an insight into what is important for customers now.

Our response to this consultation relies heavily on comments from our customers who we consulted in January 2022.

If you have any questions or require further information on this response, please contact Zoe Cox [zoe.cox@chg.org.uk](mailto:zoe.cox@chg.org.uk)

### Introduction

We welcome the introduction of the Tenant Satisfaction Measures (TSMs) because we believe they will help to improve services to customers. We welcome the opportunity to use the results to drive up standards and are keen to work on areas where we can improve.

We have prepared a consultation response gathering insight from across the organisation and our customers. Our key points are below, followed by our comments on individual questions.

- The number of TSMs should be reduced to focus on questions which really matter to customers.
- We would like more information from the Regulator on how the results will be published and presented.
- We believe the TSMs and the methodology should be designed to remove or reduce the possibility of landlords presenting their data in a better light than it is being experienced by customers. We are keen to see the TSMs as measures that can compare like for like. It would be helpful to have more detailed methodology to ensure data comparison between landlords gives a true picture.
- We believe questions should be weighted to reflect customer concerns. For example, with more focus on repairs.
- There is no measurement of value for money from a customer perspective. From our research this is something which really matters to our customers.
- We are keen to avoid survey fatigue amongst our customers so the frequency of surveys needs to be evidence based so that the surveys are carried out at the right time.
- For smaller organisations the methodology could give a distorted view of those organisations, either because of how measurement is done or the number of people asked.

With reference to building safety particularly, the safety of customers' homes is a central duty for landlords so measurements on this should aim to help identify any risks which haven't already been picked up. It is important that the TSMs are responsive to customers' new and emerging concerns.

It is important to add an element of effective qualitative data collection of customers' views as well as quantitative data. We have found that collecting customer insight through qualitative methods adds depth and can highlight emerging issues. We have found methodology is important to tease out the core issues for our customers. In our experience, giving customers a space to articulate their concerns freely, without the confines of needing to answer a specific question or score, helps to gain insight which otherwise would not be forthcoming. We would like to see a model of qualitative views where perhaps a sample of customers are able to directly input to the Regulator their thoughts on how their landlord is performing (an example of this is how Ofsted gain direct views of parents on schools).

It would be useful to have an outline of how the data will be analysed and presented. In the past, league tables may be considered to have had value, but we believe it is best practice and an innovative approach which will be most effective in changing the culture of the sector and individual organisations. We would like to see innovative approaches highlighted and to avoid the position-chasing approach of league tables.

We would be happy to share our service standards to help with developing best practice examples, and to share our experience of our journey. We would welcome all opportunities to work with the Regulator on the development of TSMs.

### **Our consultation response and evidence**

We've made positive steps in building a customer first business and would like to share details of work we have done with our customers on designing our service standards. This is relevant to the consultation and future developments of TSMs because our experience may be useful as a learning point for other organisations.

- We've used customer feedback to support the design and delivery of the standards ready for their launch soon.
- The commentary we will publish to support the quarterly results will clearly explain what we're going to do to improve performance where needed, and we'll support this with a quarterly action plan.
- Our Performance Allies, a self-named customer scrutiny group, will work with us to delve a little deeper if we see consistent themes arising from the quarterly results.

We co-created new service standards with full participation from our customers. Our aim was to develop service standards which our customers could use to hold us to account, and give them a true picture of the things that really matter to them, rather than measures we thought they would want to know about.

We reviewed our approach and developed new service standards which truly reflected our values of accountability, keeping our promises, showing kindness, and giving respect. We placed our customers at the centre and co-designed the standards with them, inviting customers to collaborate with us, using our new and innovative online community, The Garden. We gathered real-time feedback on each standard, asking customers to rate them by sentiment. Customers told us what they liked or disliked.

Through this process our customers gave us feedback which led to two new service standards, on security and feeling safe in their homes. Customers also told us that some of our measures were too ambitious, so we've added a caveat to add context.

We have gone beyond compliance and made sure we fully involved customers and gave them the tools and information they needed to give meaningful feedback. We gathered feedback that told us the whole story of our customer's experience. We used this information to give our customers a clear idea of the service they can expect from us and learn from feedback to make changes if necessary.

Our opinion is that this type of approach should be followed when deciding on the final TSMs. We think the TSMs should have value to customers and not only to evidencing compliance with the regulatory standards.

### **Consultation with Catalyst Customers on TSMs**

We used our online community, The Garden, to gather customers' views on the TSMs during a three week customer consultation. We used a sentiment rating scale survey to find out how customers felt about the measures. We think it's important to incorporate our customers feedback into this consultation and for their voice to be heard. Our customers gave us valuable real-time feedback about what actually matters to them, and we think this is useful for the Regulator to hear. We have included the views of our customers in the responses to the questions.

Our customers' views are aligned with our views, and they agree that more detail is needed from the Regulator and clarity on what the tenant is being asked to comment on.

One customer said:

"Broadly I think these are good questions, but several are a little ambiguous. One example that stands out is the idea of rating a landlord on keeping you informed of 'things that matter to you as a tenant' which could mean totally different things to each resident, and the same with the question about satisfaction of your 'neighbourhood'. Would people respond with thoughts about the estate, or the local high street and bus service provision? Clearly focussing the questions more on things that are directly within the landlord's control would probably help."

The language used by the Regulator was also mentioned by our customers and it is important to our customers that shared owners, tenants and leaseholders are defined and referred to correctly.

Overall, our customers felt many questions were vague and needed context to be able to answer them. They felt there was room for individual interpretation on many questions such as questions around neighbourhood and ASB.

### **Views of Catalyst service standards working group**

In May 2021, an operational group from across the business was set up to design our service standards. They designed the measurable performance standards across Catalyst to help us report our performance to the business, customers and external stakeholders. We consulted this group to get views on the TSM proposals.

<p>Do you agree that the proposed TSM Standard...</p> <p>a. sets clear expectations for registered providers?</p>	<p>We welcome the introduction of the TSMs because we believe they will help to improve services to customers. We welcome the opportunity to use this information to drive up standards, and we are keen to work on areas where we can improve.</p> <p>It is important that throughout these measures they remain for the customer and improve services to them.</p>
<p>b. supports the regulator in ensuring that the TSMs greater transparency about their landlord's performance</p>	<p>In principle we support TSMs where they provide meaningful data for customers to measure landlords' performance.</p> <p>However, the methodology used will be important to make sure comparisons are like for like. It may be better to consider analysing data by groups of landlords. An obvious split would be rural landlords and urban area landlords as they will face different challenges in services around ASB / neighbourhood.</p>

2. 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?

During the development of the Catalyst service standards, we focussed on the issue of repairs. We gained valuable data and views from our customers.

Our research showed that customers were less focussed on the time limits for repairs and more concerned with how informed they were about the progress of the works. For customers the key issue was that we did the repair in the time we said we would do it, even if the estimate was it would take a long time due to an issue such as getting parts etc.

As a result of the feedback we received from our customers, our service standards focus on communication with our customers at all stages and making sure we live our value of keeping our promises.

Although timeframes are good, some customers may need flexibility around repairs appointments to suit their schedules and fit in with their own commitments, such as work etc. Therefore strict, centrally set timetables are not always the best option compared to a more meaningful repair schedule.

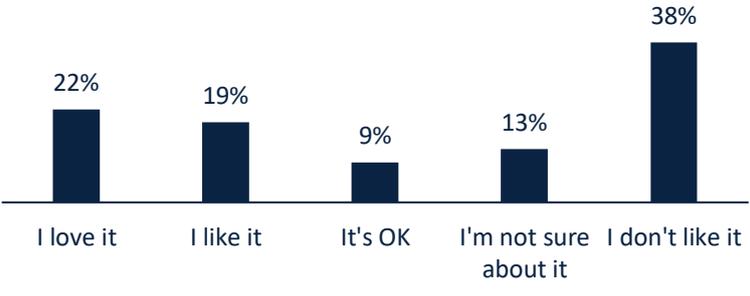
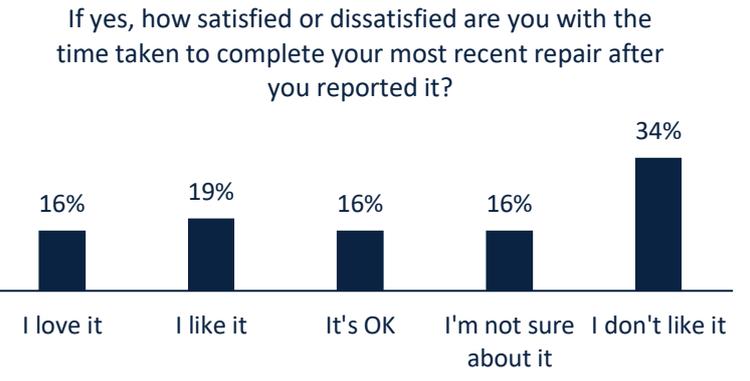
As an example, if there is a fault with the heating system our customers will need it to be fixed more quickly in the winter than the summer.

A better question might be “did your landlord agree a repair time with you and keep you informed throughout.”

**When we asked our customers what they thought of the measure being proposed our customers said:**

Our customers said that they agreed with us that it was more important to be kept informed than complete a repair badly to tick a box.



	<p style="text-align: center;"><b>Proposed question:</b> If yes, How satisfied or dissatisfied are you with the repairs service you have received to your home from your landlord over the last 12 months?</p>  <table border="1"> <thead> <tr> <th>Satisfaction Level</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>I love it</td> <td>22%</td> </tr> <tr> <td>I like it</td> <td>19%</td> </tr> <tr> <td>It's OK</td> <td>9%</td> </tr> <tr> <td>I'm not sure about it</td> <td>13%</td> </tr> <tr> <td>I don't like it about it</td> <td>38%</td> </tr> </tbody> </table>	Satisfaction Level	Percentage	I love it	22%	I like it	19%	It's OK	9%	I'm not sure about it	13%	I don't like it about it	38%
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<p>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; 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>	<p>We think repairs is the major concern for customers and it is right to focus TSMs on this issue. However, our research during the development of our service standards was that focus on the time taken to complete the repair is not the key concern for customers, most customers understand that a quick turnaround is not always possible.</p> <p>Their concerns are around how they are respected, being kept informed and keeping our promise to complete the repair in whatever timescale we say we will.</p> <p><b>When we asked our customers what they thought of the measure being proposed our customers said:</b></p> <p>One customer during our consultation said that “the main thing is for landlords to communicate with residents about issues that affect them directly, in particular, repairs.”</p>  <table border="1"> <thead> <tr> <th>Satisfaction Level</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>I love it</td> <td>16%</td> </tr> <tr> <td>I like it</td> <td>19%</td> </tr> <tr> <td>It's OK</td> <td>16%</td> </tr> <tr> <td>I'm not sure about it</td> <td>16%</td> </tr> <tr> <td>I don't like it about it</td> <td>34%</td> </tr> </tbody> </table>	Satisfaction Level	Percentage	I love it	16%	I like it	19%	It's OK	16%	I'm not sure about it	16%	I don't like it about it	34%
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<p>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:</p>	<p>We carry out all safety checks and consider this to be our duty as a responsible landlord.</p> <p>Our experience is that customers believe health and safety should be a given and they expect it to be taken care of without their involvement. We agree that the key to performance measures is to give our customers the tools to raise concerns as soon as they occur so we can work together with customers</p>												

BS01 Gas safety checks;  
BS02 Fire safety checks;  
BS03 Asbestos safety  
checks; BS04 Water  
safety checks; BS05 Lift  
safety checks?

to ensure health and safety is paramount at all times for everyone.

Our health and safety concerns may not match those of our customers. An example of this is obstructions in communal areas such as plant pots. Customers may disagree that such an obstruction is a trip or fire hazard. This could result in lower satisfaction for customers but this should not reflect negatively on landlords.

It isn't clear how the Regulator will ensure customer dissatisfaction will be looked at qualitatively to alert us to health and safety concerns which we need to address, or where there is a difference in opinion between us and our customers. For example, if customers are dissatisfied with us because we take reasonable health and safety measures, but customers think we are overzealous, we would need to have a conversation to find solutions but ultimately may still not reach an agreement, which would affect the customer's satisfaction with us. This could happen, for instance, where we require access to a customer's home and the customer isn't happy with this.

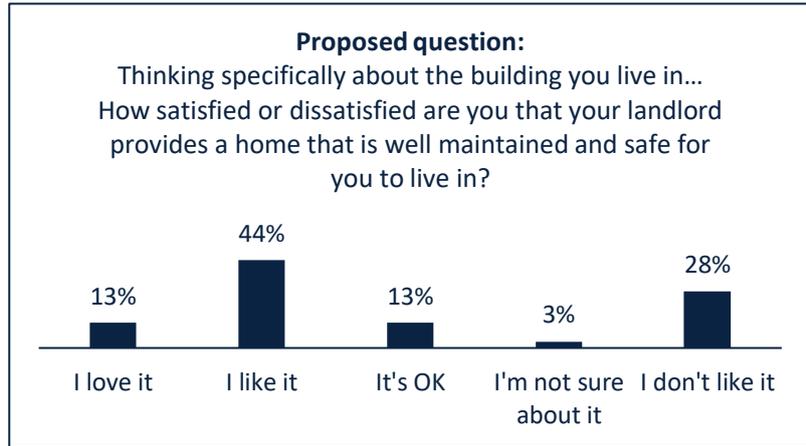
We also have concerns about the measurement used here. We would prefer the Regulator uses buildings rather than homes because otherwise the data will produce results which do not accurately reflect the issue. An example is a building with 100 homes would count as 100 units but a building with three homes would count as three units even if the issue is the same such a lift repair.

We also note that electrical checks are not included here and we think they should be included as they are an important measure of safety. It is data we already collect so wouldn't be onerous to report.

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?

In principle we agree that a customer's perceptions and assessment of safety is important and landlords need to act upon them. However, this measure would need clarity because well-maintained and safe are two different things. A well-maintained property could still be unsafe. If the aim is to provide information on customers' perception of safety then the issue of maintenance and feeling safe and secure should be separated out.

**When we asked our customers what they thought of the measure being proposed our customers said:**



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?

We use a combination of transactional and perception surveys. We also carry out follow up calls to surveys to discuss any outstanding issues to resolve them for the customers.

We welcome and use complaints as a tool for service improvement. This means it is important for the Regulator to gain the views of people who have recently used the complaints service. Customers who have never used the complaints process or made a complaint long ago will not be able to provide meaningful data on the landlord's current performance. It would be better to limit the survey to those who have made a complaint in the last 12 months.

The ease of making a complaint should be a measure as well as the number of complaints. Organisations who make their complaints service easier to access should not be penalised if they receive more complaints. Complaints in themselves are welcomed by most organisations as an indicator and as an intelligence tool to help improve services.

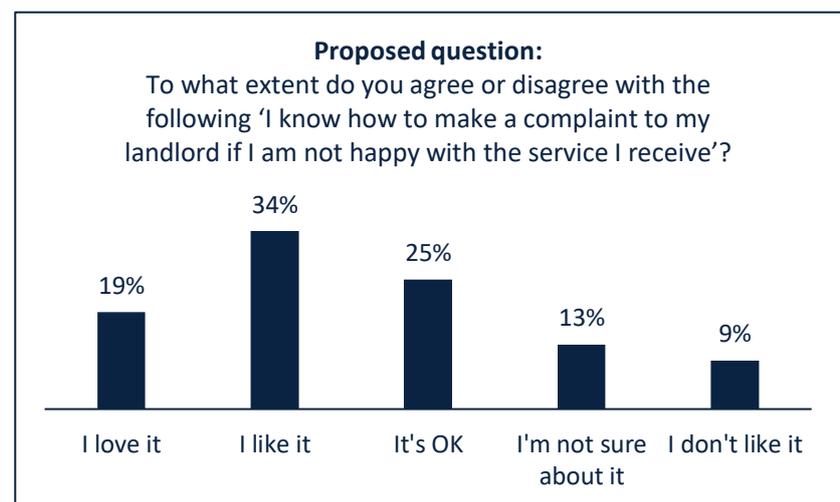
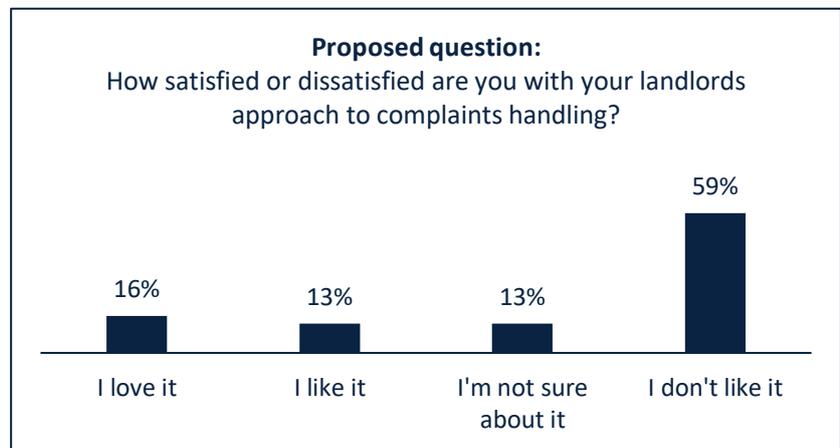
7. There are four proposed TSMs under the theme of Effective Handling of Complaints (CH01 Complaints relative to the size of the landlord; CH02 Complaints responded to within Complaint Handling Code timescales; TP11 Satisfaction with the landlord's approach to handling of complaints; TP12 Tenant knowledge of how to make a complaint). Overall, do you think they give a well-rounded picture of performance under this theme?

Handling of complaints is important to our customers and to us so that we are able to deal with any issues quickly.

We agree that measures are good but they don't show the whole picture. For example, if data was provided about the number of complaints, it is important that it is in the context of how easy it is to make complaints.

A landlord with an easier complaints process will be likely to get more complaints but this doesn't mean they are providing a bad service, just that they are more approachable and keen to resolve issues. Even an increase of complaints from year to year may not reflect negative performance and using early stage complaints to resolve issues should be applauded.

**When we asked our customers what they thought of the measure being proposed our customers said:**



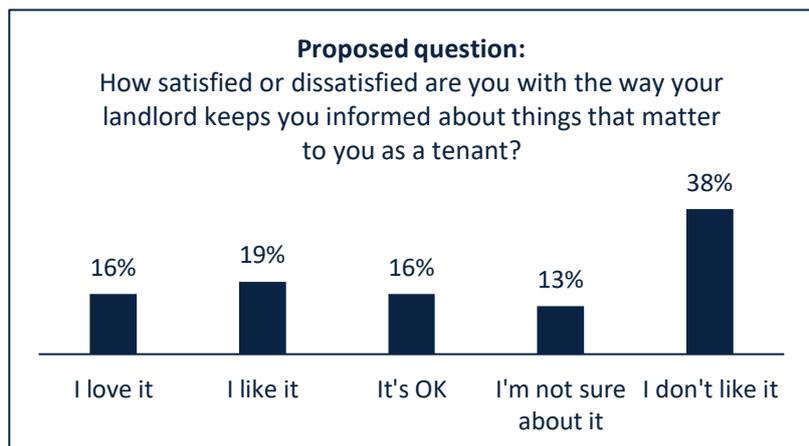
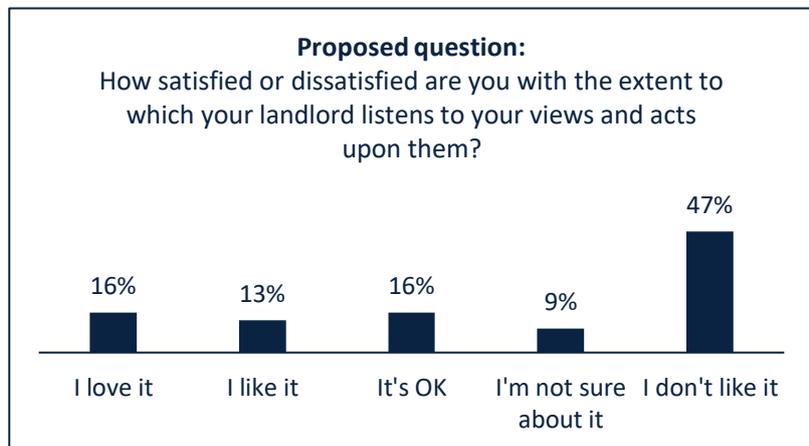
8. There are three proposed TSMs under the theme of Respectful and Helpful Engagement (TP05 Satisfaction that the landlord listens to tenant views and acts upon them; TP06 Satisfaction that the landlord keeps tenants informed about things that matter to them; TP07 Agreement that the landlord treats tenants fairly and with respect). Overall, do you think they give a well-rounded picture of performance under this theme?

We agree with these measures and they are reflected already in our values and our service standards. However, there needs to be consistency on how they are interpreted across landlords for any TSMs to be comparable.

Meaningful engagement from customers is important to understanding how satisfied they are and what really matters to them. For Catalyst it is important to know which method is better for getting meaningful information so we can improve services. Perception or transactional surveys may be appropriate.

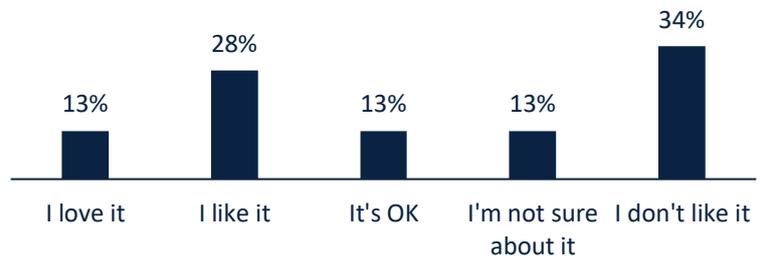
Terms such as respectful, helpful and fairness are subjective and measuring these can be problematic because different customers will interpret them differently.

**When we asked our customers what they thought of the measure being proposed our customers said:**



**Proposed question:**

To what extent do you agree or disagree with the following "My landlord treats me fairly and with respect"?



<p>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?</p>	<p>This measure and the alternative are unclear. More detail on the methodology is needed to show how this gives meaningful data.</p> <p>A landlord could make a lot of positive contribution to a neighbourhood, but a customer may still be unhappy with the place they live in. Or alternatively the landlord makes no contribution but the customer is still happy with the neighbourhood.</p> <p>It isn't clear how the Regulator would filter out reasons a customer is unhappy with their neighbourhood which are nothing to do with the landlord, such as unhappiness with the area because HS2 will now run nearby. Another example of the subjectiveness of this question is where customers are unhappy with further development in the area by the same landlord. This could be seen as a positive contribution as it provides more homes, or negative because people feel it changes the character of the area. This could be a factor particularly in more rural areas.</p> <p>The first question is only relevant if a landlord has a significant presence in the area. However, where they have only one or a few properties, the second question is more suitable.</p>
<p>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?</p>	<p>Although some of our customers may have experienced anti-social behaviour, not all have. Unlike overall satisfaction scores, or repairs etc, not everyone will have a view on this. We would need to know how this would be measured and the methodology behind this, as not all participants can respond to this.</p> <p>Measuring only the number of ASB cases doesn't give enough data for comparisons because the effectiveness of landlords is in resolving the cases rather than the number of reports. Reporting numbers only could lead to landlords delaying opening a case to hide the extent of the issue.</p> <p>This question could be seen as contributing to the stigmatising narrative that social housing creates ASB. The perception being conveyed by this question is that social housing is in high crime and ASB areas and is a common experience for our customers.</p> <p>Our experience is that this question wouldn't produce a statistically safe sample for comparisons through perception surveys but a transactional survey approach could give data on how ASB has been dealt with when it has arisen.</p>

11. 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?

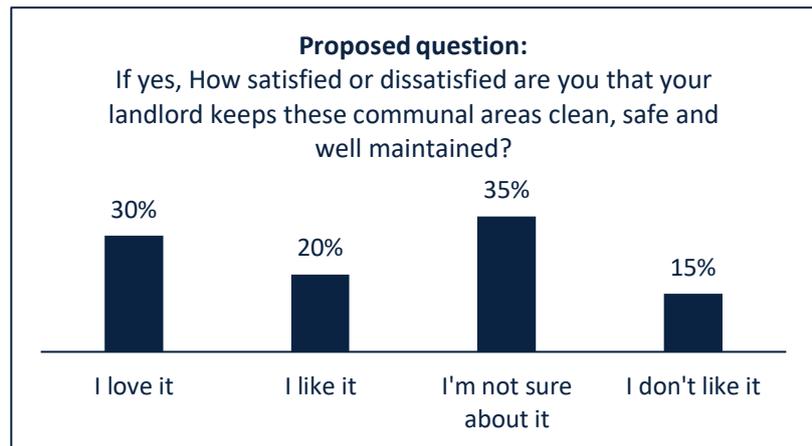
We would like to reiterate our comments around neighbourhoods. A landlord's role in neighbourhood development and contribution is often a multi-agency approach and the landlord's involvement is sometimes limited. Customers would not always be in a position to measure a landlord's performance without full information of other agencies' involvement.

ASB and neighbourhood perception by customers may be outside our control and there are lot of factors that make neighbourhoods and communities.

**When we asked our customers what they thought of the measure being proposed our customers said:**

Our customers agreed that measuring our response to ASB is problematic.

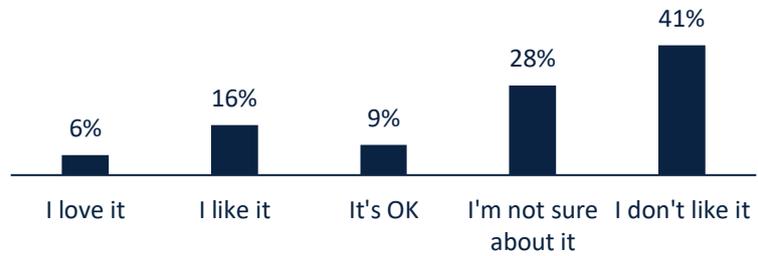
**Communal areas:**



## Neighbourhoods

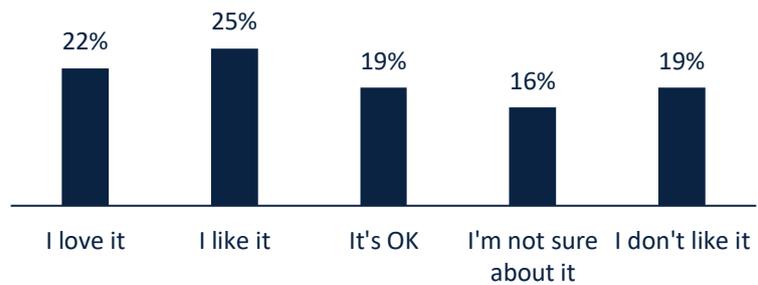
### Proposed question:

How satisfied or dissatisfied are you with the extent to which your landlord makes a positive contribution to your neighbourhood?



### Proposed question:

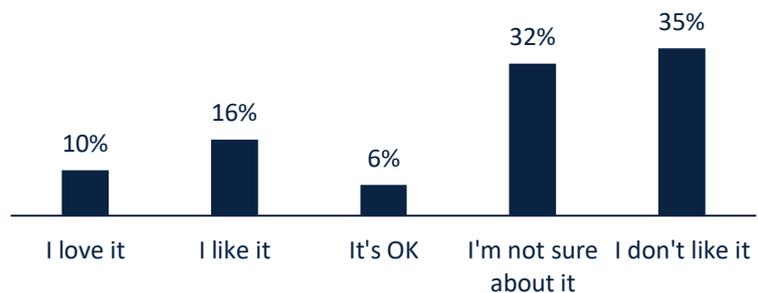
How satisfied or dissatisfied are you with your neighbourhood as a place to live?



## Anti social behaviour

### Proposed question:

How satisfied or dissatisfied are you with your landlords approach to handling anti-social behaviour?



<p>12. Number of TSMs</p>	<p>We do think there are too many TSMs. It would be better to have fewer and then add more if needed, or have flexibility to select the ones we measure. To reduce the number of TSMs we think questions around repairs and complaints could be simplified and the question on neighbourhood taken out. The ASB question should be reworded to avoid stigmatising language or removed.</p> <p>BuildEast have suggested a couple of other measures / questions which we would support and are valuable to customers. These are:</p> <ol style="list-style-type: none"> <li>1. How easy is your landlord to interact with?</li> <li>2. Do you trust your landlord?</li> </ol>
<p>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?</p>	<p>We would like to see some weighting in the measures. Those that are important to customers such as repairs should carry more weight.</p> <p>We also think that there should be recognition of satisfaction amongst different tenures. Across the sector satisfaction amongst shared owners is lower than other tenures. We think it is important to report by different tenures so it is easier to make comparisons. Otherwise landlords with proportionally more shared owners may register with higher dissatisfaction but it would be in line with the experience of the sector generally.</p> <p>We would also like clarity on how data will be collected to ensure all landlords are reporting in a transparent way to make comparisons like for like.</p>
<p>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?</p>	<p>Yes. This allows us to reach as many customers as possible. Our experience of carrying out surveys is that different groups prefer different approaches. The also addresses inclusiveness in the Equality Impact Assessment as it ensures a group isn't excluded because they do not have access to resources such as the internet. Making it as easy as possible for all customers to participate in letting us know their views is a key aim of Catalyst.</p>

<p>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?</p>	<p>Yes, we agree, but we need to be mindful of survey fatigue and survey sample sizes.</p>
<p>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?</p>	<p>It will be useful to understand how subsidiaries of larger housing associations, who we believe would report through the overarching organisations, would carry out perception surveys. There is a concern about a lack of resource for small organisations.</p>

<p>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?</p>	<p>We agree with this approach.</p>
<p>18. Do you agree with our conclusions in the draft Regulatory Impact Assessment?</p>	<p>We are not opposed to option 1 as we already carry out an annual perception survey and transactional surveys.</p>
<p>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).</p>	<p>Flexibility on how to collect data and media used to collect data is important to allow participation by all customers so no group is excluded.</p> <p>We agree that landlords should demonstrate that the method of data collection doesn't disadvantage a group of customers. For example, online surveys could disadvantage groups who don't have digital access.</p> <p>Our experiences have been that approaches by telephone are more successful than traditional postal surveys, however the online community is growing and most landlords carry out digital inclusion work to increase participation.</p>

20. 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.

We would be happy to share our experience of co-creating service standards with our customers. Our learning from the process might prove valuable to other organisations who are starting on the journey. We are particularly proud of engagement from our customers and would be happy to assist others to adopt the same model.

Our research shows that value for money is important to our customers and this measure should be included in TSMs.

We would also mention that the language we use is important to customers, for instance many customers do not like to be referred to as tenants, and this may affect engagement.

The question below relates to TP01, although not specifically referred to in the consultation response questions, we asked our customers for their thoughts on this proposed measure, they said:

