

Annual Return on the Scottish Social Housing Charter

Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. You can read our consultation paper on our website at www.housingregulator.gov.scot

Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **Friday 8 November 2024**.

By email @: consultations@shr.gov.scot

Or post to: Scottish Housing Regulator
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How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes No

If you are responding as an individual:

Please tell us how you would like your response to be published.	Pick 1
Publish my full response, including my name	<input checked="" type="checkbox"/>
Please publish my response, but not my name	<input type="checkbox"/>

1. There are some indicators which we do not routinely use in our regulatory assessment of social landlords' performance. As part of the consultation we are proposing to stop collecting the following indicators **14, 20, 23, 24, C3 and C4**.

Do you agree with our proposals to remove these indicators?

Yes

2. Following feedback from stakeholders we propose to amend the following indicators **10, 15 and C2**.

Do you agree with our proposals to amend these indicators?

We believe these should be amended, but we would suggest that the amended versions would benefit from the below adjustments.

Indicator 10: Reactive repairs completed right first time

We believe this indicator should be renamed due to the level of changes from the previous Indicator 10. With the change to a 12-month period from when the original repair was completed the denominator is no longer part of the numerator as the original failed repair may have been from a previous reporting year. We'd suggest it be renamed something similar to 'recalled repairs as a proportion of repairs completed'

Indicator 15: Anti-social behaviour cases resolved

We don't believe restoring the measure against locally agreed targets would provide benefits for either landlord benchmarking or tenant scrutiny. As these targets are locally agreed doing any comparison of them would not allow quantitative benchmarking in a meaningful way. With the amendment of Indicator 10 this would also become the only ARC indicator with any target element to it with the amendment of Indicator 10.

We've also found, from our analysis, that ASB volumes can be very contextual depending on landlords' location. As such we'd recommend if this is being used as an ASB cases per 100 units measure that it be moved to the contextual indicators.

C2: Lets in the reporting year by source of let

We agree with the changes proposed here

3. We also propose to introduce an additional indicator to monitor long term voids.

Do you agree that we should collect an additional indicator in relation to long term voids?

We believe this indicator is extremely valuable and should be collected. We would recommend it be expanded to collect data for all long-term voids, not just lettable voids given the present context of the housing emergency. We'd suggest that all voids, regardless of any committee decision, are also collected. We'd propose the following approach would be clearer and also give an idea of stock across the sector unable to be let. With the housing emergency we believe it's important all potential homes which are empty are captured here.

- (i) The number of self-contained properties void at the year end.
- (ii) The number of self-contained properties void at the year end which were lettable.
- (iii) The number of self-contained properties void for more than six months at the year end.
- (iv) The number of self-contained properties void for more than six months at the year end which were lettable.

The Inclusions/Exclusions listed are also different from those listed for Indicator 30, we'd suggest either no exclusions based on periods, but if there are it should match Indicator 30

4. We propose to collect two new indicators in relation to tenant and resident safety. Do you agree with the additional indicators we propose to collect in relation electrical safety and fire detection?

Indicator 11: How many times in the reporting year did you not meet your statutory obligations to complete a gas safety check within 12 months of a gas appliance being fitted or its last check?

We believe this is a valuable indicator, and the best version of a gas safety measure across the UK, but we'd suggest that in addition the number of gas properties in scope should be recorded (i.e. previously referred to as 'During the reporting year, the number of properties which required gas safety records.'). As there is a move away from gas heating, or for landlords with stock not using gas boilers, it'd help put the number of gas fails in context.

Electrical Safety: How many times in the reporting year did you not meet the requirement to complete an electrical safety inspection (EICR) within five years of the last EICR?

We believe this is a robust and well-defined measure. We would add, in the same vein as Indicator 11, the total properties in scope should also be collected.

Fire Safety: Number of homes that do not have 'satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire' installed at the year end.

We believe this measure should be amended to be more similar to Indicator 11, though we appreciate this may be more challenging under current guidance. We would recommend it also be expanded to cover other parts of the building (e.g. communal areas) where it's not a house. Finally, we'd note this only covers fire warning and does not provide any data around other key areas such as fire doors etc.

5. Do you agree with our proposed approach to collect landlords' performance in relation to compliance with tenant and resident safety duties as part of the Annual Assurance Statements?

We believe these additional building safety measures are valuable but can understand the desire to minimise reporting. We note these additional measures are successfully collected as part of the Tenant Satisfaction Measures in England.

6. Issues of damp and mould continue to be an important area of concern for tenants. We therefore propose three new indicators in relation to damp and mould. Do you agree with our proposals to introduce these indicators?

We agree, though we believe from our own benchmarking calendar days is a more useful metric from a tenant perspective as tenants will be in their home during the period on all days. While we appreciate this aligns with Indicator 9, we've seen a number of landlords move away from a weekday only repairs service and, in our opinion, we'd suggest both be aligned to calendar days.

We'd also suggest that, from our data, damp and mould is not always a responsive repair as some equivalent works required to resolve are classed as planned works by some landlords where it's more extensive.

We've been asked by one of our members to note that this is Housemark's viewpoint on this matter and does not necessarily represent the consensus view of all our Scottish members.

7. Do you agree with the proposal to collect the "Average length of time taken to resolve cases of damp and/or mould" or would the "median" be more appropriate to measure the time to resolve cases of damp and/or mould?

We believe average is most appropriate

8. Damp and mould is a complex area for landlords. Are the new indicators we propose on damp and mould clearly defined?

From our consultations with customers and research we believe these indicators are generally as well defined as is reasonably possible for damp & mould in a way all landlords can reasonably be expected to measure it. We do suggest that the definitions make reference to defined policies and procedures used by the landlord to ensure it's clear on what criteria is being used to decide what a case of damp and mould is. We'd suggest the following amendment to the definition.

Cases of damp and/or mould

Any repair that has been reported as or assessed as a case of damp and/or mould **in line with the landlords own policies and procedures**

We've been asked by one of our members to note that this is Housemark's viewpoint on this matter and does not necessarily represent the consensus view of all our Scottish members.

Thank you for taking the time to give us your feedback